

# Exhibit 1

National Board of Osteopathic Medical Examiners  
COMLEX-USA Computer-Based Cognitive Examinations  
2014 Examination Dates

Level 1

JANUARY						
S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8		10	
12	13		15	16	17	18
19		21	22	23	24	25
26	27	28	29	30	31	

Level 2

FEBRUARY						
S	M	T	W	T	F	S
2		4	5	6	7	8
9	10	11	12		14	
16	17	18	19	20	21	22
23	24		26	27	28	

Level 3

MARCH						
S	M	T	W	T	F	S
						1
2	3	4	5	6		8
9	10	11	12	13	14	15
16						22
23						
30	31					

APRIL						
S	M	T	W	T	F	S
					4	5
6	7	8	9	10	11	12
13	14		16		18	19
20	21	22	23	24	25	
27	28	29	30			

MAY						
S	M	T	W	T	F	S
4	5	6	7	8	9	10
11		13	14		16	17
18	19	20	21	22	23	24
25	26	27	28	29		31

JUNE						
S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29						

JULY						
S	M	T	W	T	F	S
			2		4	
6		8			11	12
13	14	15				17
20		22	23	24	25	26
27		29	30			

AUGUST						
S	M	T	W	T	F	S
					1	2
3		5		7		9
10	11				15	
17				21	22	
24		26	27	28		30
31						

SEPTEMBER						
S	M	T	W	T	F	S
	1	2	3	4		6
7	8		10		12	13
14	15	16		18	19	
21	22		24	25		27
28	29					

OCTOBER						
S	M	T	W	T	F	S
			1	2	3	4
5			8		10	11
12		14	15	16	17	18
19	20	21		23	24	25
26	27	28	29	30	31	

NOVEMBER						
S	M	T	W	T	F	S
2	3	4	5		7	8
9	10	11	12	13	14	15
16	17		19	20	21	
23	24	25	26	27	28	29
30						

DECEMBER						
S	M	T	W	T	F	S
				4		6
7	8	9	10	11	12	13
14		16	17	18	19	20
21	22		24	25	26	
28	29	30	31			

## COMLEX-USA Exam Fees

### 2014 & 2015 Fee Schedules

COMLEX-USA Cognitive Evaluation	July 1, 2014 - June 30, 2015	July 1, 2015 - June 30, 2016
COMLEX-USA Level 1	\$570	\$590
COMLEX-USA Level 2 Cognitive Evaluation	\$570	\$590
COMLEX-USA Level 3	\$775	\$800
(Exam fee is determined by the registration date)		

### Fees associated with Computer Based Examinations

#### COMLEX-USA Level 1, 2-CE and 3

More than 30 days before scheduled examination - rescheduling or cancellation fee	None
Between 30 days before and up to 5 days before scheduled examination - rescheduling or cancellation fee	\$85.00
Between 5 Days before and up to 24 hours before scheduled examination - cancellation fee	\$190.00
Less than 24 Hours - Cancellation or "No Show" - candidate cancels his or her scheduled examination, fails to show at the scheduled time and place for an examination, or is prohibited from taking the examination	\$225.00

Please consult the Bulletin of Information for applicable refund policy.

### Non-Examination Related Fees

Score Confirmation	\$50.00	Score confirmation can be requested from your NBOME online account and under the "view score" tab.
Non-sufficient Funds Check Fee	\$20.00	
Transcript	\$55.00	Per request/per transcript
Score Report (COMLEX-USA Level 1, 2-Cognitive Evaluation, and Level 3)		
Photocopy (only sent to candidate)	\$5.00	Per request/per level
Applicable only to examinations administered before 9/1/2012		

#### National Board of Osteopathic Medical Examiners, Inc.

Corporate Offices & Conference Center: 8765 W. Higgins Rd Suite 200 • Chicago, IL 60631-4174

Executive Offices and National Center for Clinical Skills Testing: 101 West Elm Street Suite 150 • Conshohocken, PA 19428

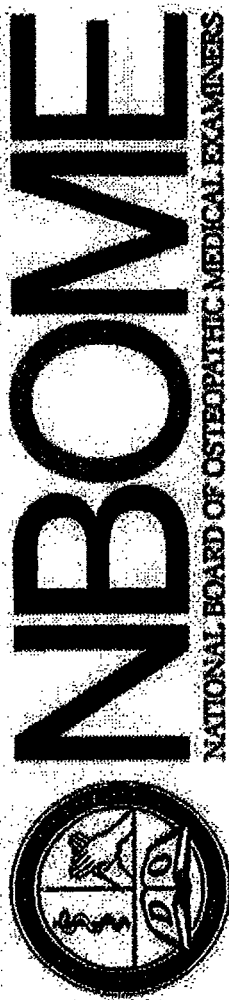
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<http://www.nbome.org/exams-fees.asp>

## Exhibit 2



# Introduction to the NBOME Client Registration System

National Board of Osteopathic Medical Examiners | Copyright © 2013 by NBOME

❖ **Set up your online account in our Client Registration System (CRS)**

- Use link provided in the "COMLEX-USA Level 1 – How to Register" email
- Create user name, password, secret question and answer

❖ **Register for an examination**

- Confirm eligibility
- Read NBOME Bulletin of Information – the BOI is 36 pages long, please take the time to read and understand it
- Purchase examination
  - Select examination to purchase
  - Agree to Terms and Conditions
  - Confirm billing and payment information

❖ **Schedule an examination**

- Select location and date for examination
- Receive confirmation email

❖ **Locate COMLEX-USA test dates**

❖ **Access your online account for future services**

## **Setting up your online account:**

Use the link provided in the email to access NBOME's Client Registration System (CRS).

Please verify that your name and date of birth are displayed correctly before continuing. If the information is not accurate, contact NBOME Client Services.

When prompted, create a user name, password, secret question, and answer. Should you need to reset your password in the future, the secret question and answer will allow you to do so.

Click "Apply Changes" when finished.

You will now be logged in to your online account. Please confirm all personal data and complete any fields marked with an asterisk.

You are not permitted to change any protected information: your name, social security number, date of birth or NBOME identification number. Should any of that information be incorrect, please contact NBOME Client Services immediately to have it corrected.

**Note:** You are responsible for updating your contact information—including your phone number, mailing address, email address and any changes to your name. This record will be used throughout your career. Incorrect information can affect your ability to sit for an examination and important information from the NBOME.

Click "Apply Changes" when finished.

[illegible]



## Registering for an examination:

You must register for each COMLEX-USA examination through the NBOME CRS as you become eligible for each level.

To confirm that you are eligible to register, the Level 1 box should be checked under the "Exam Eligibility" heading. Your Dean's office is the only one authorized to approve your eligibility. If the box is not checked, please contact your Dean's office.

The image shows a registration form for the NBOME (National Board of Osteopathic Medical Examiners). The form is titled "NBOME" in large, bold letters at the top left. Below the title, there is a section for "Registration Information" which includes fields for "Name", "Address", "City", "State", "Zip", "Phone", and "Email". There is also a section for "Exam Eligibility" with checkboxes for "Level 1", "Level 2", and "Level 3". The form is partially filled out, with some information visible in the "Registration Information" section.

Please be advised that every candidate must certify that they have read the NBOME Bulletin of Information (BOI) at the link located in the upper right hand corner. (This will take 15 minutes or more.) You will be required to agree to its basic terms and conditions before purchasing any examination, as you will see when you reach the "Shopping Cart" tab.

To continue with the registration process, click the "Register or Schedule Exams" tab.

The COMLEX USA Level 1 exam should appear under "Eligible Exams to Purchase".

Check the box to "Purchase Exam" and click "Add to Cart."

You will also notice "COMSAE Exams to Purchase" on this page. The Comprehensive Osteopathic Medical Self-Assessment Examination (COMSAE) is a self-assessment tool for osteopathic medical students. Its format and structure closely resemble that of COMLEX. COMSAE Phases 1, 2, and 3 can be purchased for \$55. For more information about COMSAE, please refer to our website, [www.nbome.org](http://www.nbome.org).

**NBOME**  
NATIONAL BOARD OF MEDICAL EXAMINERS

Eligible Exams to Purchase

Check the box under "Purchase Exam" and then "Add to Cart".

Exam	Purchase Exam	Add to Cart
COMLEX USA Level 1	<input type="checkbox"/>	<input type="button" value="Add to Cart"/>
COMLEX USA Level 2	<input type="checkbox"/>	<input type="button" value="Add to Cart"/>
COMLEX USA Level 3	<input type="checkbox"/>	<input type="button" value="Add to Cart"/>
COMSAE Phase 1	<input type="checkbox"/>	<input type="button" value="Add to Cart"/>
COMSAE Phase 2	<input type="checkbox"/>	<input type="button" value="Add to Cart"/>
COMSAE Phase 3	<input type="checkbox"/>	<input type="button" value="Add to Cart"/>

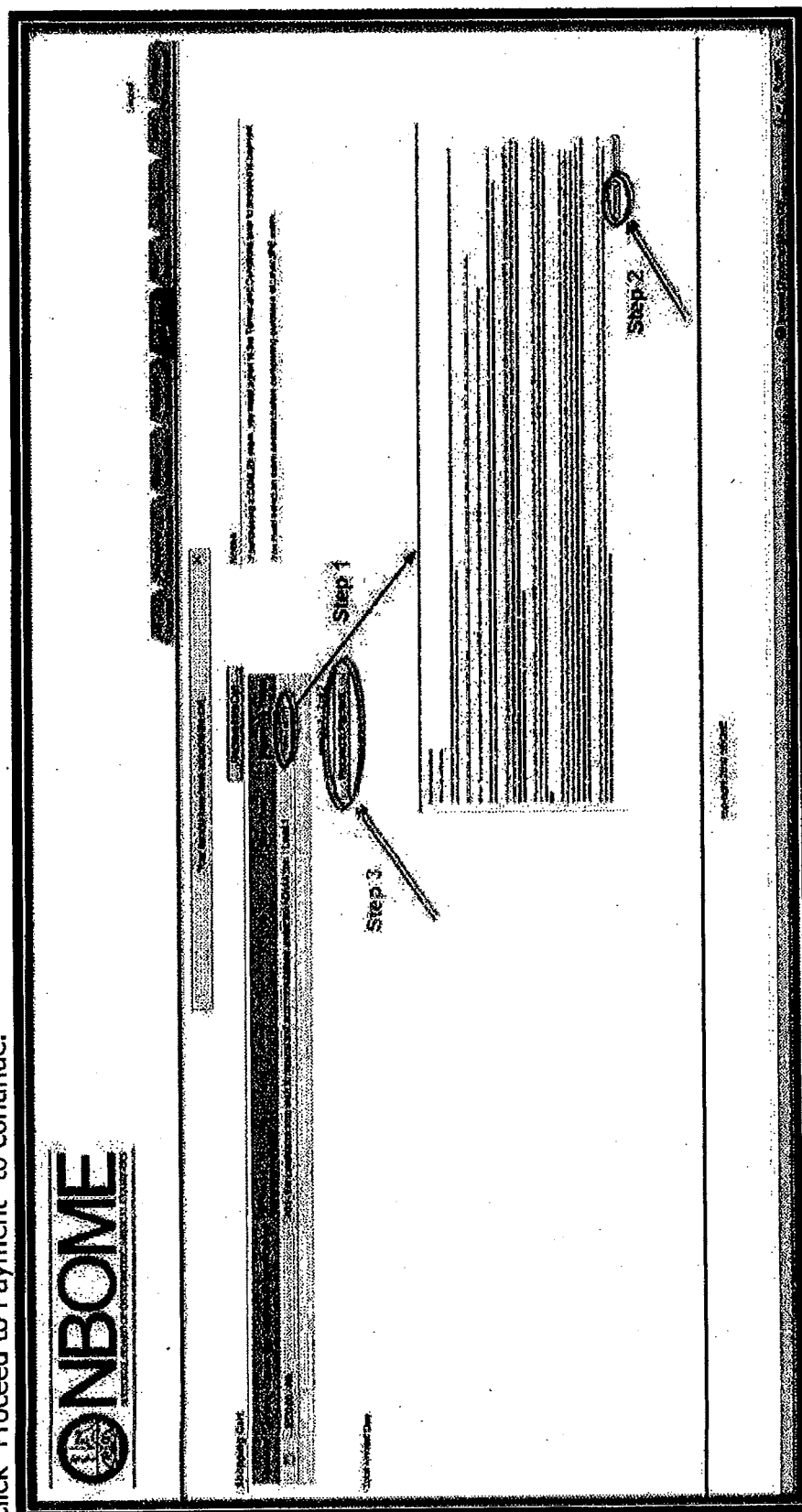
Copyright 2015 NBOME

Now select the "Shopping Cart" tab, which will display your selected examination.

Click "View Terms," to bring up NBOME's *Terms and Conditions*. In order to proceed with the registration process, you must agree to these terms, including that you have read and understand the most current BOI.

Once complete, the "View Terms" button will change to read "Agreed."

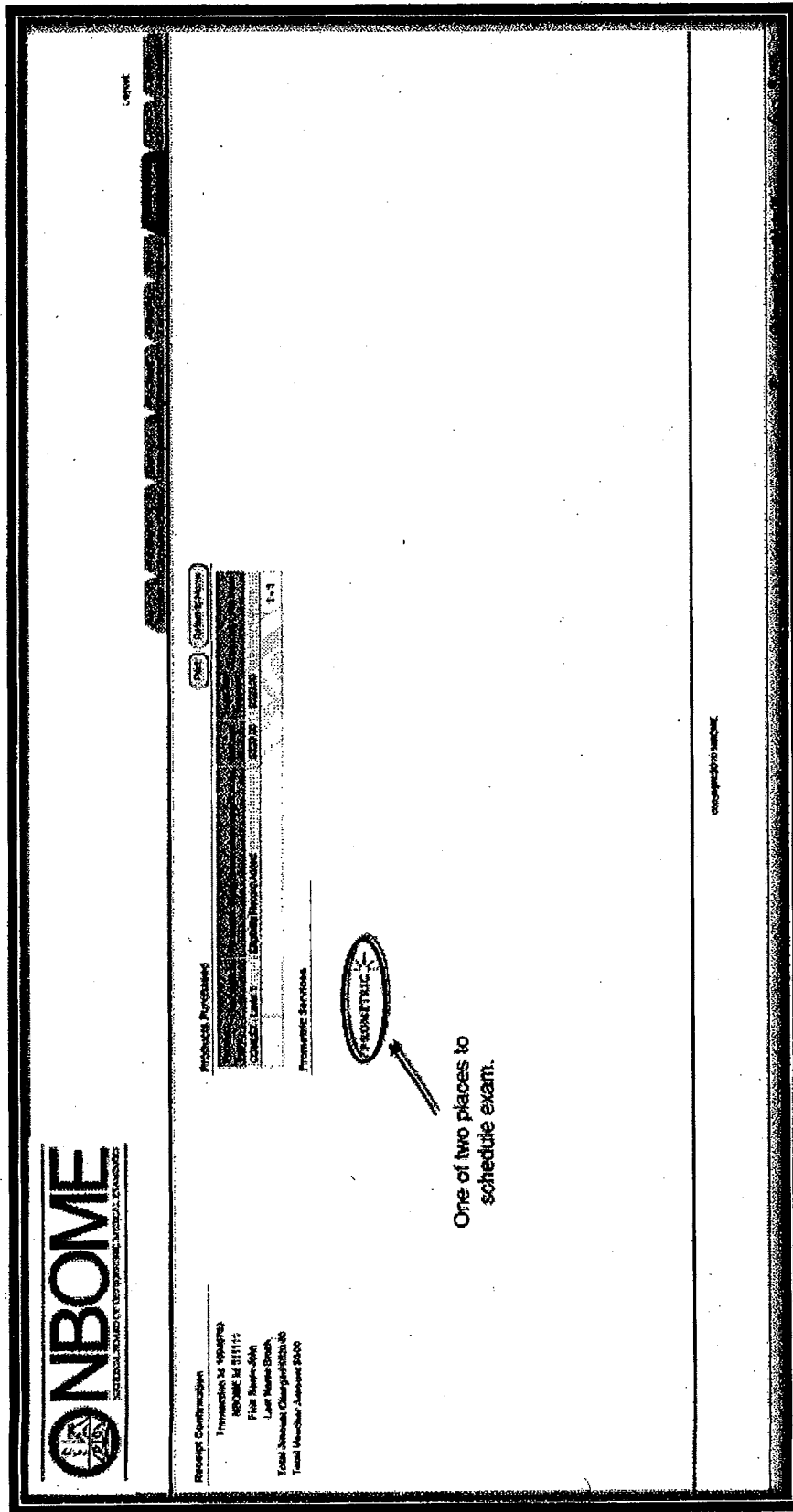
Click "Proceed to Payment" to continue.





## Scheduling an examination:

Computer-based examinations are administered at Prometric Test Centers across the US and Canada. Prometric's ~~computer-based examinations~~ process, you may select an examination date and location through Prometric's website, which can be accessed one of two ways: the "Transactions" tab or the "My Account" tab.



### **From the "Transactions" tab:**

Click on the Prometric logo located in the center of the page. This will redirect you to the Prometric website where you can select a location and date for your examination.



### From the "My Account" tab:

After your purchase has been completed, you will notice that a new examination appears under the "Exam Status" heading located on the right hand side of the page.

Click the "Schedule" link to be redirected to the Prometric website where you will be able to select a location and date for your examination.

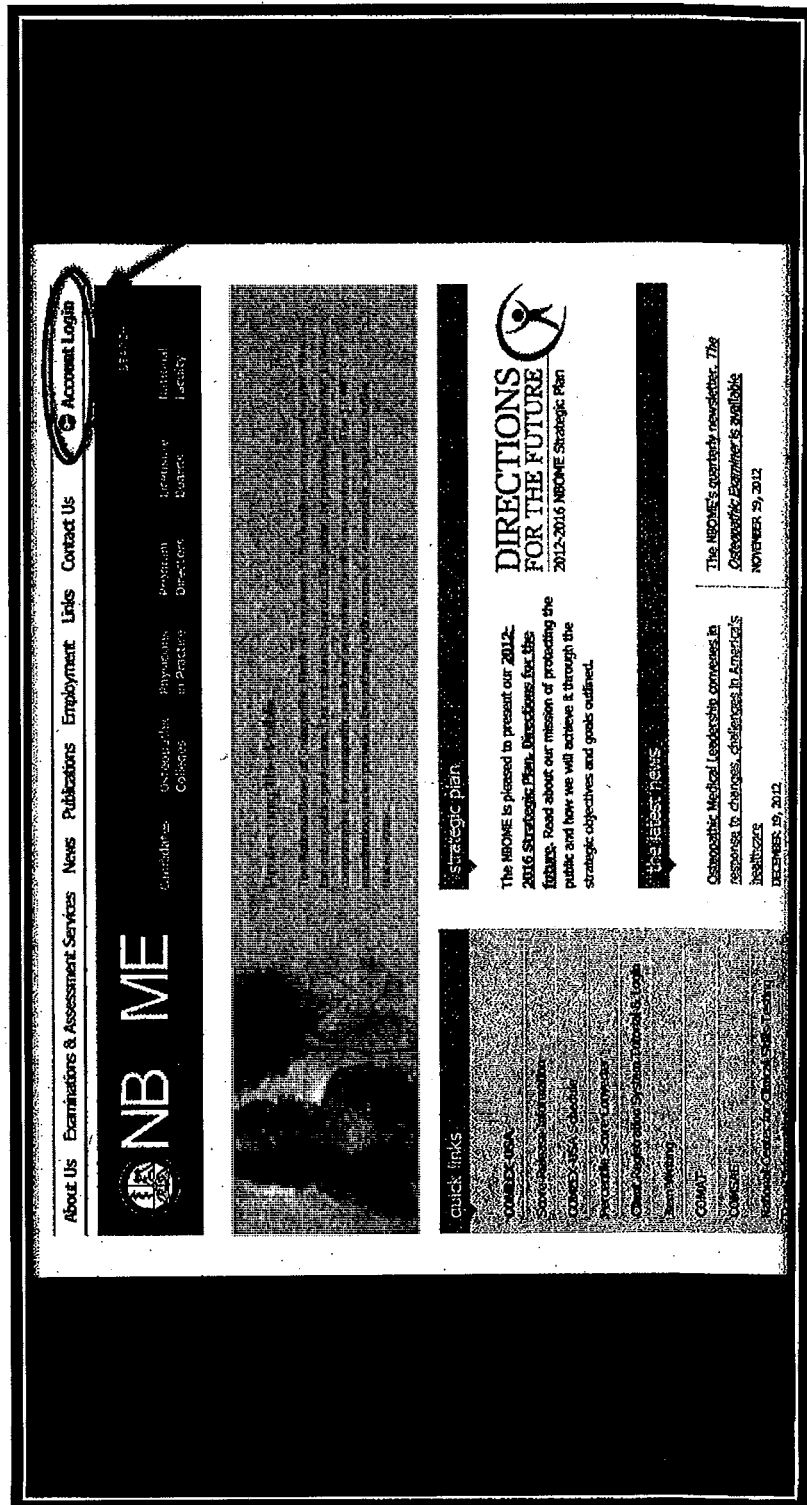
**Note:** Once scheduled, you will receive a confirmation email from Prometric which will include the date, time, and test center information for your scheduled examination. Please allow at least 24 hours for the NBOME online system to update your status. Once updated, you will see the examination date and Prometric appointment ID displayed under "Exam Status."

If you don't receive a confirmation email within 48 hours of scheduling your exam, please contact Client Services.

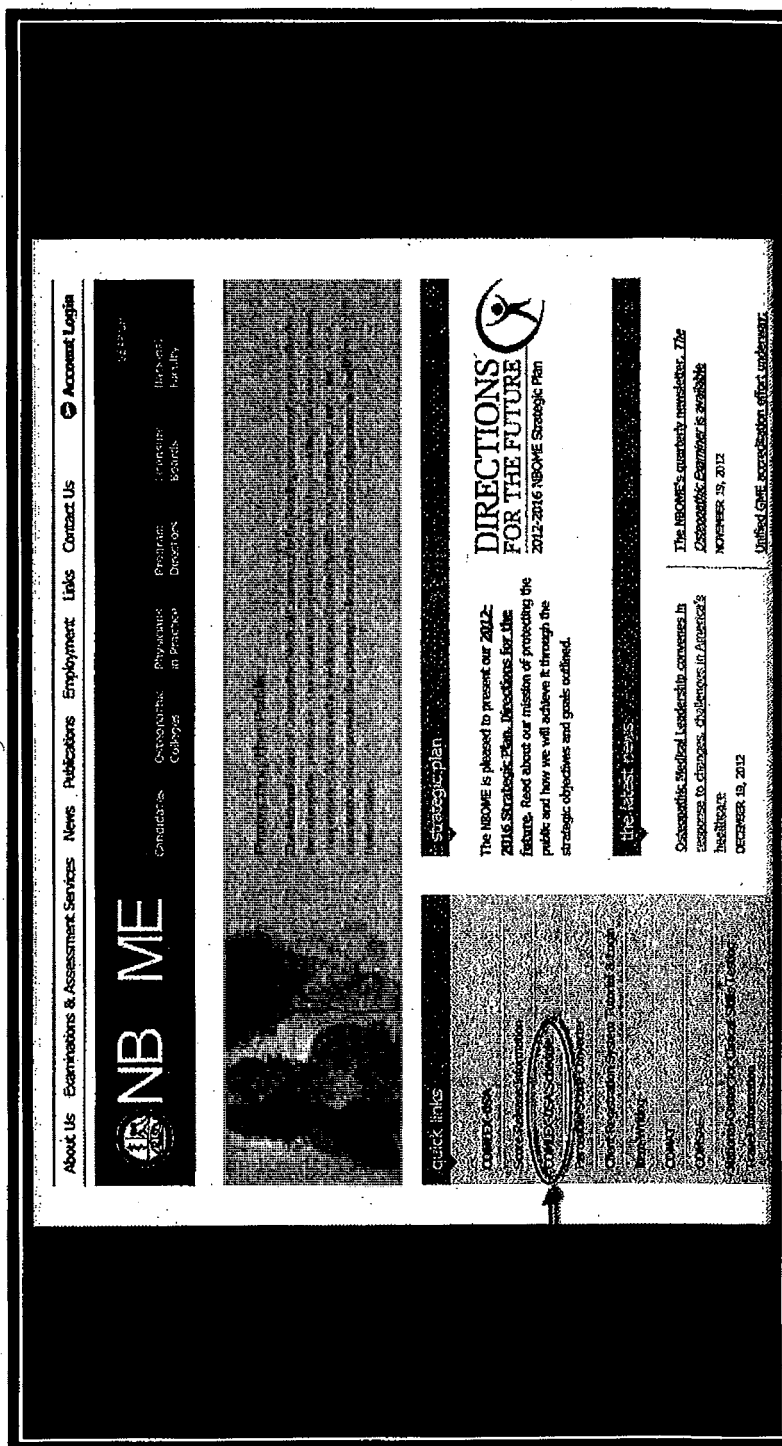
The screenshot displays the NBOME website interface. At the top, the NBOME logo is visible. Below the logo, there is a navigation bar with tabs including 'Home', 'About Us', 'Contact Us', 'My Account', and 'Schedule'. The 'My Account' tab is currently selected. On the right side of the page, under the 'Exam Status' heading, there is a list of examinations. One examination is listed with a 'Schedule' link next to it. A red circle and an arrow point to this 'Schedule' link, with a text label stating 'One of two places to schedule exam.' Below the list of examinations, there is a section for 'Client Services' with contact information for the NBOME Client Services team, including a phone number (1-866-479-6828) and an email address (clientservices@nbome.org).

## **Accessing your online account:**

Now that your account has been created, you will be able to access it for all future services by going to our website, [www.nbome.org](http://www.nbome.org), and selecting the login feature in the upper right hand corner.



To see the full calendar of COMLEX-USA examination dates, go to our website [www.nbome.org](http://www.nbome.org), and click "COMLEX-USA Schedule" from the Quick Links section.





## Exhibit 3

Source: ACDM, Annual Diagnostic Health School Comprehensive Study of Academic Year  
 1999, including the school students and teachers.

## Exhibit 4



**NBOME**  
NATIONAL BOARD OF OSTEOPATHIC MEDICAL EXAMINERS

**COMLEX-USA  
BULLETIN OF INFORMATION**

**2013-2014**

Published July 1, 2013

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**COMLEX-USA Bulletin of Information  
2013-2014**

All candidates are required to read and be familiar with the contents of this Bulletin of Information prior to registering for and scheduling examinations.

**The policies, rules, procedures and obligations of candidates set forth in this Bulletin of Information are legally binding upon all candidates and will be applied and interpreted by the NBOME at its sole discretion. A decision by the NBOME regarding the application or interpretation of these rules and procedures is final. The NBOME may amend, modify and/or supplement these policies, rules, procedures and obligations of candidates at any time and from time to time without the consent of any candidate. All changes to the Bulletin of Information shall be effective when published on the NBOME website.**

Inquiries should be directed to:

National Board of Osteopathic Medical Examiners, Inc.

**Client Services**

Toll-free: (866) 479-6828

Hours: 7:00 am – 7:00 pm (EST) Monday – Friday

**Corporate Offices & Conference Center:**

8765 W. Higgins Rd., Suite 200

Chicago, IL 60631-4174

Phone: (773) 714-0622, Toll-free: (877) 714-0622

Fax: (773) 714-0631

**Executive Offices &**

**National Center for Clinical Skills Testing (NCCST)**

101 West Elm Street, Suite 150

Conshohocken, PA 19428

NCCST Hours: 8 AM to 4:30 PM (EST) Monday – Friday

Toll-free number: 866-NBOME 97 (866) 626-6397

NCCST Emergency Line with recorded Level 2 – Performance Evaluation status message: (610) 825-4240

A candidate should refer to his or her NBOME ID number when making inquiries.

This Bulletin of Information is published at the NBOME website.

Candidates may e-mail requesting additional information to [clientservices@nbome.org](mailto:clientservices@nbome.org).

Registration and scheduling can be completed online at <http://www.NBOME.org> in accordance with the requirements set out in this Bulletin of Information.

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## I. INTRODUCTION

The National Board of Osteopathic Medical Examiners, Inc. (NBOME) is a nonprofit corporation, organized under the laws of the state of Indiana. The NBOME was established in July 1934 as the National Board of Examiners for Osteopathic Physicians and Surgeons, Inc. The first examinations were given in February 1935, and in 1987, the name of the organization was changed to the National Board of Osteopathic Medical Examiners, Inc.

**The mission of the NBOME is to protect the public by providing the means to assess competencies of osteopathic medicine and related health care professions.**

The NBOME initiated the current three-level Comprehensive Osteopathic Medical Licensing Examination (COMLEX-USA) program beginning in 1995 to replace the former three-part NBOME licensure examination series. The NBOME COMLEX-USA examination program is the primary pathway to licensure for osteopathic physicians seeking to practice osteopathic medicine and surgery. The primary purpose for the COMLEX-USA examination program is for osteopathic physician licensure. A passing score on these examinations indicates that the candidate's osteopathic medical knowledge and clinical skills have met an acceptable national standard for entry level competency. The COMLEX-USA examination sequence is accepted for physician licensure in all 50 states and some international jurisdictions.

To maintain the validity and broad acceptance of the COMLEX-USA examination program, the NBOME continually engages in research to ensure the examinations include currently accepted principles, concepts and practices of osteopathic medicine. Testing methodology and testing procedures are studied to confirm the examination scores continue to reflect accurately the knowledge and skills of those who seek to practice osteopathic medicine.

The COMLEX-USA examination sequence uses a primary care approach to patient care with the distinctiveness of osteopathic medicine fully integrated throughout the examination program. Please refer to the pertinent sections of this bulletin for detailed information regarding the examinations.

## II. TERMS AND CONDITIONS

### A. Terms and Conditions

By registering for, scheduling or taking any examination administered by or for the NBOME, including all COMLEX-USA examinations, the candidate acknowledges that he or she has read and understands the NBOME Bulletin of Information (or has had an opportunity to do so) published at the NBOME website and agrees to the following:

1. Bulletin of Information Legally Binding. He or she intends to be and is legally bound by all the terms and conditions set forth in the NBOME Bulletin of Information, including all modifications, amendments and supplements thereto, in effect as of the dates the candidate registers for, schedules and takes any NBOME examination. The most recent edition of the Bulletin of Information is published by the NBOME on its website.

2. Duty to Maintain Confidentiality. The candidate shall not discuss, disclose, paraphrase, publish or otherwise make known to anyone any test item, information relating to any NBOME examination or other confidential property belonging to the NBOME that is not publically



available on the NBOME website, and will not contribute to or participate in the development or administration of in any manner whatsoever, directly or indirectly, any commercial test preparation service or enterprise for a period of at least eighteen (18) months following the date that any NBOME examination was administered to the candidate.

**3. Duty to Cooperate With Investigations.** The candidate agrees to fully cooperate with any NBOME investigation of any possible irregularities in test administration, candidate behavior, breach of test security or confidentiality. Failure to fully cooperate can result in sanctions, including examination failure, notation of irregular conduct, suspension of eligibility or permanent loss of eligibility to challenge a future COMLEX-USA examination.

**4. No Access to Confidential Property.** All examinations of the NBOME and its means and methods for test development and methodology for testing and scoring examinations, and all related data and other information, are the confidential property of the NBOME. The candidate has no right, title or interest whatsoever in or access to any examination or other confidential property belonging to the NBOME (except only confidential access to the examination during the administration of the examination to the candidate as permitted by the NBOME and under strict supervision of a proctor or NBOME's testing vendor).

**5. Limitation of Liability.** Neither the NBOME nor its employees, officers, directors or agents shall be responsible or liable to the candidate or any other person for any direct, indirect, consequential, punitive or other damages claimed by or for the candidate, or for any injunctive or other equitable relief whatsoever, even if caused by any negligent act or omission, except for the refund to the candidate of any registration fee or other fee paid by the candidate related to the claim, that being the candidate's sole remedy for any such claim.

**6. Release of NBOME and Others.** The candidate unconditionally releases and discharges the NBOME, its employees, officers, directors and agents ("Released Parties") from any and all claims, liabilities, damages or losses whatsoever, known or unknown, that arise out of or are related to any act or omission, including any negligent or other act or omission of the Released Parties or any of them, including but not limited to the construction, administration or scoring of any NBOME examination administered to the candidate at any time.

**7. Choice of Law, Forum Selection.** These terms and conditions and all other agreements of the candidate with the NBOME shall be construed only under the laws of the state of Indiana, and any claim or action brought by or for the candidate shall be brought only in a court of competent jurisdiction located in Marion County, state of Indiana, to which jurisdiction the candidate personally and expressly consents, as more fully described in Section II. B. of the Bulletin of Information and which is incorporated here by reference.

**8. Violation by Candidate's Obligations.** If the candidate breaches or violates any of his or her obligations described in the Bulletin of Information, including but not limited to the candidate's confidentiality obligations, such breach or violation is considered irregular conduct and may result in the non-scoring or voiding of the candidate's examination and assignment of a "Fail" score and/or other sanctions which the NBOME may impose in its sole discretion. In addition to all other remedies available to the NBOME. The candidate also acknowledges and agrees that the NBOME has no adequate remedy at law and is entitled to injunctive and/or other equitable relief without bond to prevent or limit any further violation of these Terms and Conditions or disclosure of test items or other confidential property of the NBOME.

**9. Miscellaneous.** The Bulletin of Information including these terms and conditions is legally binding upon the candidate, his or her heirs, estate, successors and assigns. No provision, term or condition may be waived by the NBOME without the expressed written consent of an authorized officer of the NBOME. If any provision, term or condition of the Bulletin of Information is unenforceable for any reason, the remaining provisions, terms and conditions

shall remain in full force and effect. If any claim or action is brought against the NBOME by or for the candidate, or by the NBOME against the candidate to enforce any provision, term or condition of the Bulletin of Information, the candidate shall be liable to the NBOME for all losses and damages, including reasonable attorneys' fees and costs, incurred by the NBOME to defend or prosecution such claim or action.

10. Amendments. The NBOME may at any time and from time to time amend, modify or supplement any or all the provisions, terms and conditions of the Bulletin of Information, with notice to or consent of the candidate, and all such amendments, modifications or supplements shall be effective when published by the NBOME in the Bulletin of Information.

**B. Choice of Law, Forum Section**

The provisions, terms and conditions of the Bulletin of Information, and any and all other agreements of the candidate with the NBOME, are governed by and shall be construed only under the laws of the state of Indiana, and any claim by or for the candidate against the NBOME or any of its employees, officers, directors or agents, arising out or relating to the construction, administration, scoring or otherwise of any examination of the NBOME, or any act or omission of the NBOME or any of its employees, officers, directors or agents, will be determined under the laws of the state of Indiana, without regard to the conflict laws of any state. The candidate expressly agrees and submits to the jurisdiction of courts of or located in the state of Indiana, and further expressly agrees that any claim, demand or complaint whatsoever by or for the candidate against the NBOME, or any of its employees, officers, directors or agents, shall be brought only in a court of competent jurisdiction located in Marion County, Indiana, to the exclusion of all other courts and jurisdictions. The candidate acknowledges and agrees that NBOME examinations are administered in all 50 states of the United States and elsewhere, and that it is reasonable for the laws of the state of Indiana, the place of incorporation of the NBOME, to be applicable and that any claim, demand or complaint by the candidate against the NBOME, its employees, officers, directors or agents be brought only in a court located in Marion County, Indiana. Notwithstanding the foregoing, the NBOME may in its sole discretion require that any claim, demand, complaint of the candidate or any of its employees, officers, directors or agents, or other dispute between the candidate and the NBOME, be resolved by arbitration in Marion County, Indiana, in accordance with the laws of the state of Indiana.

**C. Available Formats of Terms and Conditions**

The NBOME will provide to the candidate at no fee a copy of the Bulletin of Information, including the foregoing terms and conditions, in paper or in electronic form upon written request by the candidate delivered to the NBOME. If any of the terms and conditions is required to be in writing for any purpose, the candidate may, by a clear written statement delivered to the NBOME, withdraw his or her consent to these terms and conditions being in electronic form for future examinations, acts or omissions; provided all the terms and conditions shall be and remain legally binding upon the candidate for any and all examinations scheduled or administered to the candidate and acts and omissions of the NBOME occurring prior to delivery to the NBOME of any such withdrawal of consent to this agreement being in electronic form, and candidate may not register for, schedule or take any further examination of the NBOME unless and until he or she has executed and delivered to the NBOME his or her agreement to these terms and conditions in paper form.

### **III. ELIGIBILITY**

#### **A. Eligibility**

As a condition of taking any examination of the NBOME, the candidate must certify that he or she is the person taking the examination and is eligible to take the examination. The candidate must also acknowledge that he or she is legally bound by all the terms, conditions, and obligations of candidates, including but not limited to the provisions, terms and conditions as set forth in the most recently published Bulletin of Information. A candidate may not re-take any level of COMLEX-USA to improve his or her score or for any purpose other than to pass a previously failed examination.

**Subject to the foregoing conditions, and the re-take policy described in Section V. E. (page 19) of this Bulletin of Information, the following are the eligibility requirements for each of the COMLEX-USA examinations:**

#### **COMLEX-USA Level 1**

A candidate is eligible to take the COMLEX-USA Level 1 examination if he or she meets the following requirements:

1. Satisfactorily completed the first academic year of study at an osteopathic medical school accredited by the American Osteopathic Association's Commission on Osteopathic College Accreditation (AOA COCA);
2. Is in good standing as a matriculated student in an accredited osteopathic medical school; and
3. The Office of the Dean of an accredited osteopathic medical school has approved the candidate to take the COMLEX-USA Level 1 examination and the NBOME has received confirmation of that approval from the Office of the Dean.

#### **COMLEX-USA Level 2-CE (Cognitive Evaluation)**

A candidate is eligible to take the COMLEX-USA Level 2-CE (Cognitive Evaluation) examination if he or she meets the following requirements:

1. Passed the COMLEX-USA Level 1 examination as determined by the NBOME;
2. Satisfactorily completed the second academic year of study at an osteopathic medical school accredited by the American Osteopathic Association's Commission on Osteopathic College Accreditation (AOA COCA);
3. Is in good standing as a matriculated student in an accredited osteopathic medical school; and
4. The Office of the Dean of an accredited osteopathic medical school has approved the candidate to take the COMLEX-USA Level 2 examinations and the NBOME has received confirmation of that approval from the Office of the Dean.

**COMLEX-USA Level 2-PE (Performance Evaluation)**

A candidate is eligible to take the COMLEX-USA Level 2-PE (Performance Evaluation) if the candidate meets eligibility requirements to take the COMLEX-USA Level 2-CE examination.

1. Passed the COMLEX-USA Level 1 examination as determined by the NBOME;
2. Satisfactorily completed the second academic year of study at an osteopathic medical school accredited by the American Osteopathic Association's Commission on Osteopathic College Accreditation (AOA COCA);
3. Is in good standing as a matriculated student in an accredited osteopathic medical school; and
4. The Office of the Dean of an accredited osteopathic medical school has approved the candidate to take the COMLEX-USA Level 2 examinations and the NBOME has received confirmation of that approval from the Office of the Dean.

**COMLEX-USA Level 3**

A candidate is eligible to take the COMLEX-USA Level 3 examination if he or she meets the following requirements:

1. Passed the COMLEX-USA Level 1, COMLEX-USA Level 2-CE and COMLEX-USA Level 2-PE examinations as determined by the NBOME; and
2. Graduated from an osteopathic medical school accredited by the American Osteopathic Association's Commission on Osteopathic College Accreditation (AOA COCA) with an earned D.O. degree and the NBOME has received confirmation from the Office of the Dean of the candidate's college/school of matriculation or a verified copy of his or her diploma from an accredited osteopathic medical school.

**B. Sequence of Examinations**

The COMLEX-USA Levels must be taken in sequence.

1. The candidate must successfully complete COMLEX-USA Level 1 before taking either part of Level 2 (Performance Evaluation or Cognitive Evaluation).
2. Thereafter, COMLEX-USA Level 2-CE and COMLEX-USA Level 2-PE may be taken in any order.
3. The candidate must pass the COMLEX-USA Level 2-CE **and** COMLEX-USA Level 2-PE examinations in order to take the COMLEX-USA Level 3 examination.

**C. Out-of-Sequence Administration of COMLEX-USA Level 2-PE**

The NBOME may, at the sole discretion of its Vice President for Clinical Skills Testing, administer the COMLEX-USA Level 2-PE examination out of sequence to a candidate who graduated from an AOA COCA-accredited osteopathic medical school and successfully completed COMLEX-USA Level 3 (or its equivalent), provided all of the following criteria are met:

1. A medical licensing agency or jurisdiction, either domestic or international, which issues licenses to practice medicine ("Medical Licensing Agency"), provides a written request to the NBOME that the NBOME administer the COMLEX-USA Level 2-PE examination out of sequence to the candidate;
2. The candidate and Medical Licensing Agency accept as final the NBOME's standard pass/fail decision for the COMLEX-USA Level 2-PE examination, which is intended to assess the clinical skills and osteopathic principles required to solve clinical problems for entry into graduate medical education; and
3. The candidate agrees to indemnify and hold harmless the NBOME, including reasonable attorneys' fees and costs, arising out of or relating to the administration of the COMLEX-USA Level 2-PE examination.

If the NBOME approves the Medical Licensing Agency's request to administer the COMLEX-USA Level 2-PE examination to a candidate out of sequence, the candidate must register and schedule to take the examination and pay the appropriate registration fee(s) as required by the NBOME.

The candidate may not register for or schedule an out-of-sequence COMLEX-USA Level 2-PE examination until the candidate is notified by the NBOME that the Medical Licensing Agency's request has been approved by the NBOME.

The NBOME will provide the score and other related information directly to the Medical Licensing Agency and, if requested by the Medical Licensing Agency, to the candidate.

**D. Recommendations for Completing the COMLEX-USA Series**

At this time, the NBOME does not limit the number of times a candidate may re-take an examination that he or she did not pass (subject, however, to the 12-month limitations stated on page 19 – "Re-taking Failed Examinations"), the NBOME recommends that a medical licensing authority require the candidate to successfully complete the full sequence of the COMLEX-USA examinations (Levels 1, 2-CE, 2-PE and 3) within a seven-year period, beginning with the date the candidate passes the COMLEX-USA Level 1 examination.

The NBOME also recommends that a candidate not be allowed more than three attempts to pass the examination at any Level without the candidate first demonstrating to the Medical Licensing Agency that the candidate has obtained additional educational or clinical experience acceptable to the Medical Licensing Agency.

**NOTICE of NEW POLICY:**

Effective July 1, 2016, candidates taking COMLEX-USA examinations will be limited to a total of six (6) attempts for each examination (COMLEX-USA Level 1, Level 2 CE, Level 2 PE and Level 3), including but not limited to all attempts prior to July 1, 2016.

The time period within which to complete the full sequence of examinations and the number of attempts allowed to complete an examination at any Level without additional educational experience varies among the state medical licensing authorities.



The NBOME has established and recommends a minimum passing score for the examinations at each Level. A medical licensing authority may accept the recommended minimum score for the pass/fail decision, or it may establish its own passing score for any of the COMLEX-USA examinations.

To obtain specific information as to what is required by a particular medical licensing authority in the jurisdiction in which he or she intends to apply for medical licensure, the candidate should contact that authority (see [www.fsmb.org](http://www.fsmb.org)).

#### **IV. DESCRIPTION OF EXAMINATIONS**

##### **A. Overview and Blueprint**

The COMLEX-USA examination series is designed to assess the osteopathic medical knowledge and clinical skills considered essential for osteopathic generalist physicians to practice osteopathic medicine without supervision. The foundation for COMLEX-USA is based on the osteopathic philosophy of whole person healthcare, underlying structure-function relationships and the interdependence of body systems, self-healing and self-regulatory mechanisms, and the osteopathic approach to patient care, including osteopathic manipulative medicine. COMLEX-USA is constructed in the context of clinical problem-solving that involves patient presentations and physician tasks. COMLEX-USA examinations are administered only in the English language.

The Patient Presentation ("Dimension 1") of the COMLEX-USA examination blueprint identifies high-frequency and/or high-impact health and disease issues that osteopathic generalist physicians encounter in clinical practice.

The Physician Task ("Dimension 2") specifies the major physician tasks and competency sets that osteopathic physicians generally employ to solve clinical problems and assist in providing patient care. Major categories of the two dimensions can be found in Table 1. Detailed topics covered by each category can be found on the NBOME website, under Information for Candidates / COMLEX-USA / Examination descriptions and blueprint.

The COMLEX-USA program is an examination sequence with three Levels. While all examination Levels have the same two-dimensional content structure, the depth and emphasis of each Level parallels the educational experiences and the clinical responsibilities of the candidate. This progressive nature of the COMLEX-USA examinations ensures the consistency and continuity of the measurement objectives of the osteopathic medical licensing examinations. A description of the examination blueprints is below, and descriptions of each examination component of the series, including what constitutes a passing score, follows.

##### **Table 1 - Blueprint for Computerized COMLEX-USA Examinations**

Osteopathic principles and practices, by design, are integrated throughout all dimensions of the COMLEX-USA examination program, as this best reflects the manner in which osteopathic principles and practices are integrated into osteopathic medicine.

Category	Percent Weighting
<b>Dimension 1: Patient Presentation</b>	<b>Level 1, Level 2 CE, Level 3</b>
Population Health Concepts and Patients with Presentations Related to Health Promotion, Chronic Disease Management, & Human Development	8 – 16%
Patients with Presentations Related to Digestion and Metabolism	4 – 10%
Patients with Presentations Related to Cognition, Behavior, Sensory & Central Nervous Systems, Substance Abuse, and Visceral & Sensory Pain	28 – 38%
Patients with Presentations Related to the Musculoskeletal System, Including Somatic Pain	6 – 12%
Patients with Presentations Related to the Genitourinary System & Human Sexuality	3 – 8%
Patients with Presentations Related to Circulation and the Respiratory System	8 – 16%
Patients with Presentations Related to Thermoregulation	2 – 6%
Patients with Presentations Related to Trauma, Masses, Edema, Discharge, and the Skin, Hair, & Nails	8 – 16%
Patients with Presentations Related to Pregnancy, the Peripartum, and the Neonatal Period	3 – 8%

Category	Percent Weighting by Level		
<b>Dimension 2: Physician Tasks</b>	<b>Level 1</b>	<b>Level 2 CE</b>	<b>Level 3</b>
Health Promotion & Disease Prevention	1 – 5%	15 – 20%	15 – 20%
History & Physical Examination	5 – 15%	30 – 40%	10 – 20%
Diagnostic Technologies	1 – 5%	10 – 20%	15 – 25%
Management	2 – 7%	10 – 20%	25 – 40%
Scientific Understanding of Health & Disease Mechanisms	70 – 85 %	5 – 15 %	5 – 10%
Health Care Delivery Issues	1 – 3 %	5 – 10%	5 – 10%

**B. COMLEX-USA Level 1**

Candidates are expected to demonstrate application of foundational and basic biomedical science knowledge relevant to clinical presentations as defined by the Level 1 blueprint. Level 1 emphasizes the scientific concepts and principles necessary for understanding the mechanisms of health, clinical problems, and disease processes.

COMLEX-USA Level 1 is a problem-based and symptom-based assessment integrating the foundational and basic biomedical sciences of anatomy, behavioral science, biochemistry, microbiology, osteopathic principles, pathology, pharmacology, physiology and other areas of

medical knowledge as they are relevant to solving clinical problems and assisting in providing patient care. The examination consists of two four-hour test sessions during one day, each containing questions related to diverse clinical presentations.

Passing of COMLEX-USA Level 1 indicates that the candidate has demonstrated competence in the foundational biomedical sciences and osteopathic principles as required to solve clinical problems in the supervised clinical practice setting and to prepare for lifelong learning.

**C. COMLEX-USA Level 2-Cognitive Evaluation (CE)**

COMLEX-USA Level 2-Cognitive Evaluation (CE) is constructed according to the COMLEX-USA examination blueprint. Candidates are expected to demonstrate application of knowledge of clinical concepts and principles involved in all steps of clinical problem solving as defined by the Level 2-CE blueprint. Level 2-CE emphasizes the biomedical concepts and principles necessary for making appropriate clinical diagnoses through patient history and physical examination findings.

COMLEX-USA Level 2-CE is a problem-based and symptom-based assessment integrating the clinical disciplines of emergency medicine, family medicine, internal medicine, obstetrics/gynecology, osteopathic principles, pediatrics, psychiatry, surgery, and other areas necessary to solve medical problems as defined by the Level 2-CE blueprint. A similar problem-symptom-based approach is used in Level 2 as in Level 1. The examination consists of two four-hour test sessions during one day, each containing questions related to diverse clinical presentations.

Passing COMLEX-USA Level 2-CE indicates that the candidate has demonstrated competence in the clinical and biomedical sciences and osteopathic principles as required to solve clinical problems and manage patient presentations in the supervised clinical practice setting and for entry into graduate medical education, and to prepare for lifelong learning.

**D. COMLEX-USA Level 2-Performance Evaluation (PE)**

The COMLEX-USA Level 2-Performance Evaluation (PE) is a one-day examination of clinical skills where each candidate will encounter twelve standardized patients over the course of a seven-hour examination day. The examination is administered at NBOME's National Center for Clinical Skills Testing, 101 W. Elm St, Conshohocken, Pennsylvania (near Philadelphia).

Examination design, test specifications, test format and other details are available in the current [Orientation Guide for COMLEX-USA Level 2-PE](#) on the NBOME website. An [instructional video on COMLEX-USA Level 2-PE](#) is available for viewing on the NBOME's website.

COMLEX-USA Level 2-PE is the clinical skills component of the COMLEX-USA series. Consistent with the NBOME's mission to protect the public by providing the means to assess competencies for osteopathic medicine and related health care professions, COMLEX-USA Level 2-PE is designed to help fulfill the public and licensing authority mandate for enhanced patient safety through the documentation of the clinical skills proficiency of graduates from osteopathic medical schools.

The Performance Evaluation augments the written COMLEX-USA Level 2-CE (Cognitive Evaluation) of osteopathic medical knowledge by providing an assessment of fundamental clinical skills. These clinical skills tested include: physician-patient communication, interpersonal skills and professionalism, medical history-taking and physical examination skills, osteopathic principles and osteopathic manipulative treatment, and documentation skills (including synthesis



of clinical findings, integrated differential diagnosis, and formulation of a diagnostic and treatment plan).

These patient-centered skills are evaluated in the context of clinical encounters with standardized patients for a maximum 14-minute duration, and are required to be personally performed as appropriate in a timely, efficient, safe, and effective manner within that finite time period, a limited time period which may be critical to a patient's health.

The COMLEX-USA Level 2-PE examination assesses the ability of the candidate to interact with patients who vary in age, gender, and ethnic and cultural background, and includes clinical presentations of a variety of patients that could be acute, chronic or opportunities for health promotion and disease prevention. This diversity of standardized patients is essential to the construct of the examination.

Therefore, requests to expand the 14-minute patient encounters or to alter the standardized patient mix encountered during the examination will not be considered, as this would fundamentally alter the assessment of the clinical skills being assessed by the COMLEX-USA Level 2-PE examination.

The ability to communicate in the English language is required in each clinical encounter.

For case selection, COMLEX-USA Level 2-PE applies the Dimension 1 categories from the COMLEX-USA blueprint. The content (case selection) of Level 2-PE is incorporated across the following axis:

Patient Presentation Axis. Standardized patients present in simulated ambulatory medical settings with problems and symptoms that are either acute or chronic, or that provide opportunities for health promotion and disease prevention. In addition, the patients encountered are balanced to meet the examination specifications for patient gender and age as a reflection of national osteopathic physician practice patterns based on national survey data as well as expert judgment. In addition, the demographic and cultural profiles of patients are instrumental considerations in the case development process.

Osteopathic Medical Practice Axis. In any examination form, the following clinical skills are evaluated in the majority of the standardized patient encounters (all encounters require that the candidate use the English language in communicating with the standardized patients and in documenting the SOAP notes):

Biomedical/Biomechanical Domain

- Osteopathic Principles and/or Osteopathic Manipulative Treatment
- History-taking and Physical Examination Skills
- Integrated Differential Diagnosis and Clinical Problem-solving
- Documentation and Synthesis of Clinical Findings (SOAP note format)

Humanistic Domain

- Physician-Patient Communication, Interpersonal Skills, and Professionalism

**Passage of both of the Biomedical/Biomechanical and Humanistic distinctive domains is required to pass the COMLEX-USA Level 2-PE examination.**

Clinical Content Axis. Based on Dimension 1 of the COMLEX-USA blueprint, expert judgment, and national survey data of osteopathic physician practice patterns, COMLEX-USA Level 2-PE candidates will encounter standardized patients presenting with the

symptoms, problems, or complaints that are common to primary care osteopathic medical practice. These include:

- Patients with Neuromusculoskeletal Symptoms/Problems
- Patients with Respiratory Symptoms/Problems
- Patients with Gastrointestinal Symptoms/Problems
- Patients with Cardiovascular Symptoms/Problems
- Patients with Other Symptoms/Problems

Passing COMLEX-USA Level 2-PE indicates that candidates have demonstrated competence in the clinical skills and osteopathic principles required to solve clinical problems and manage patient presentations for entry into graduate medical education and to prepare for lifelong learning.

**NOTICE of PLANNED CHANGE:**

Effective July 1, 2014, candidates taking COMLEX-USA Level 2-PE will be required to use computer keyboard data entry to complete the SOAP note portion of the encounter.

**E. COMLEX-USA Level 3**

Candidates are expected to demonstrate application of knowledge of clinical concepts and principles necessary for solving clinical problems as defined by the Level 3 blueprint. Level 3 emphasizes the biomedical concepts and principles required to make appropriate patient management decisions as independently practicing osteopathic generalist physicians.

COMLEX-USA Level 3 is a problem-based and symptom-based assessment integrating the clinical disciplines of emergency medicine, family medicine, internal medicine, obstetrics/gynecology, osteopathic principles, pediatrics, psychiatry, surgery, and other areas necessary to solve medical problems as defined by the Level 3 blueprint. Level 3, like Level 2-CE and Level 1, is problem-based and symptom-based in presentation. The examination consists of two four-hour test sessions during one day, each containing questions related to a diversity of clinical osteopathic presentations.

Passing COMLEX-USA Level 3 indicates that the candidate has demonstrated competence in the clinical and biomedical sciences and osteopathic principles as required to solve clinical problems and manage patient presentations in the unsupervised clinical practice setting and to prepare for lifelong learning.

**V. REGISTRATION AND SCHEDULING**

**A. Registration Overview**

All candidates intending to take any COMLEX-USA examination must use the online access system at the NBOME website to register and pay for an examination, schedule an examination, cancel an examination, withdraw from an examination, reschedule an examination, receive a voucher, obtain the schedule of test dates, and choose a location at which to test (except candidates who request test accommodations, as explained below).

When the NBOME receives information from the dean of the candidate's osteopathic medical school that the candidate has met the eligibility requirements to take a COMLEX-USA examination, the NBOME will send an email with a link to the candidate to initially access the NBOME online access system and establish an account. The candidate will not be provided the link until that eligibility information is received.

To establish an online account with the NBOME, use the link provided in the email to access the system. After creating a username and password, candidates should input and verify their personal information. A candidate may not take a COMLEX-USA examination unless the candidate has completed all of the steps to establish his or her online account.

After properly establishing an online account with the NBOME, the candidate may register to take any COMLEX-USA examination for which he/she is eligible. Once all required fees are paid with an approved credit card, the candidate will be able to schedule the selected examination. A candidate will NOT be able to schedule an examination until all required fees are paid. In the event of any default by candidate of payment of any fee to the NBOME or its testing vendor, the NBOME will be entitled to recover all unpaid fees and costs of collection, including reasonable attorneys' fees and costs.

**Important: A candidate may register and schedule an examination as early as six to 12 months in advance of a scheduled test date for the COMLEX-USA Level 1, Level 2-CE, or Level 3 examination (depending on the preferred test center), and up to 12 months in advance for the COMLEX-USA Level 2-PE examination, provided he or she is eligible at the time of registration and scheduling of the examination.**

A candidate should schedule an examination date at least 90 days in advance of the desired test session to maximize the chance of obtaining his or her desired testing date and site. Candidates should schedule the COMLEX-USA Level 2-PE up to a year in advance to maximize the chance of obtaining his or her desired testing date, and prior to January 31 of his or her graduation year in order to receive his or her score by May 1<sup>st</sup> of that year.

Candidates may not schedule any computer-delivered COMLEX-USA examination less than 120 hours in advance of the start of the testing session. For the COMLEX-USA Level 2-PE, candidates may use the online scheduling system up until 120 hours prior to the start of an examination. After that, a candidate may attempt to schedule an examination (availability and administrative conditions permitting) by calling the NBOME National Center for Clinical Skills Testing (NCCST). If you identify an examination vacancy for which you would like to register, please call the NCCST at (866) 626-6397.

Candidates will find the most current information about policies and procedures applicable to testing and other items of interest at [www.nbome.org](http://www.nbome.org).

As a condition of registering and scheduling online to take any examination of the NBOME, the candidate must certify that he or she is the person identified in the registration, that he or she is eligible to take the examination, and that he or she acknowledges and agrees that he or she is legally bound by all the terms, conditions, and obligations of candidates, including but not limited to the Terms and Conditions as set forth in this Bulletin of Information, including all amendments, modifications and supplements thereto.

It is the sole responsibility of the candidate to provide accurate and current information as required by the NBOME, including the latest candidate contact information, either in writing

delivered to the NBOME by a traceable means or electronically at (candidate can update personal profile through his or her NBOME online account).

**B. Test Accommodation Requests**

The NBOME complies with the Americans with Disabilities Act as amended (ADA), which requires the NBOME to provide appropriate and reasonable testing accommodations for persons with disabilities as that term is defined by law, unless the testing accommodation would fundamentally alter the nature of the examination being administered.

A person with disabilities for purposes of the ADA includes a person who has a physical or mental *impairment* that *substantially limits* one or more *major life activities* of that individual, as compared to *most people in the general population*.

The term physical or mental *impairment* means any condition that impairs the candidate's ability to function that is permanent or long lasting. The term *substantially limits* a major life activity is defined in terms of the general population -- and means that the candidate's impairment prevents or substantially limits a major life activity of the candidate compared to most people in the general population, not compared to the candidate's peer group such as other medical students. A *major life activity* refers to activities that are generally performed by most people in their daily lives.

A candidate who applies for a testing accommodation under the ADA must provide to the NBOME written, credible and objective documentation to establish that he or she has a physical or mental *impairment* that *substantially limits* one or more of his or her *major life activities*, as compared to *most people in the general population*, and the appropriateness of the testing accommodation requested by the candidate.

The NBOME determines on a case-by-case basis whether a candidate has adequately documented with credible and objective evidence that he or she is a person with disability under the ADA and whether the requested testing accommodation is an appropriate accommodation. Considerable weight is given to prior accommodations provided for high stakes testing. However, having received prior accommodations does not ensure that a request for an accommodation to take a COMLEX-USA examination will be approved. The candidate must establish to the satisfaction of the NBOME all the criteria required for a testing accommodation under the ADA, including the appropriateness of the requested accommodation, before the NBOME will approve any accommodation in connection with the administration of a COMLEX-USA examination.

The NBOME is not required by the ADA to provide a testing accommodation that is unreasonable or an accommodation that would fundamentally alter the nature of the examination, including the measurement of the knowledge or skills being tested by the NBOME, or that would impose an undue burden upon the NBOME or to other candidates.

Although the NBOME may in an appropriate case provide extended time to complete a COMLEX-USA cognitive examination or to complete a SOAP note in the COMLEX-USA Level 2-PE, the NBOME will not provide additional time to complete the patient encounter portion of the COMLEX-USA Level 2-PE examination because any such accommodation would fundamentally alter the measurement of the skills being tested in an encounter with a patient who may have a life-threatening condition, namely the skill to evaluate the condition of the patient within a 14-minute finite period.

Application for Accommodation

A candidate who is a person with disability under the ADA and wants a test accommodation for an examination of the NBOME must complete and submit to the NBOME a written request for an accommodation using the appropriate form provided online by the NBOME, with all documentation necessary and appropriate to substantiate that he or she is a "person with disability" under the ADA and the appropriateness of the requested accommodation.

To request a test accommodation:

1. Download the appropriate "Request for Accommodation Application" form from the NBOME website and carefully read the instructions. Note, there are different forms for computer-based examinations and the clinical skills examination.
2. Obtain sufficient credible and objective documentation that substantiates the candidate is a person with disability for purposes of the ADA and the appropriateness of accommodation requested.
3. Complete the Request for Accommodation Application in full.
4. Submit the completed Request for Accommodation Application with supporting documentation (substantiating he or she is a person with disability under the ADA and the appropriateness of the requested accommodation) to the NBOME.

It is the responsibility of the candidate to obtain all documentation required to establish that he or she is a person with disability under the ADA and the appropriateness of the requested accommodation.

Applications and related information available on the NBOME website include the Request for Test Accommodation and Instruction Forms for the COMLEX-USA Examinations, Levels 1, 2-CE and 3; and the Request for Accommodation Application for the COMLEX-USA Level 2-PE examination.

Candidates who request test accommodations should check the NBOME website (enter "Test Accommodation" in search engine) for the most current policies and information.

**The application and all appropriate information and documentation should be submitted at least 90 days (3 months) for computer-based cognitive examinations (COMLEX-USA Level 1, Level 2-CE and Level 3) and 180 days (6 months) for the clinical skills examination (COMLEX-USA Level 2-PE) before the date the candidate desires to take a COMLEX-USA examination with a testing accommodation under the ADA. An accommodated examination may not be scheduled unless and until the request for an accommodation has been approved by the NBOME.**

**A candidate may schedule a standard (non-accommodated) examination appointment while his/her application to take an examination with accommodations is pending. However, if the application is approved by the NBOME and testing accommodations are granted, the candidate will likely need to reschedule the examination date(s), depending on the nature of the accommodation granted. Rescheduling fees will be waived if the candidate is approved for testing accommodations that require rescheduling of the standard test administration.**

The NBOME endeavors to promptly evaluate and provide decisions on all applications for testing accommodations. Completed applications with full documentation are generally evaluated within 30 days of receipt of all materials and after the evaluation the candidate is promptly advised whether the application is approved. Incomplete applications will delay the evaluation



and decision. Other factors that can delay NBOME decisions include additional evaluation required by external expert consultants, or other circumstances beyond the NBOME's control.

The NBOME recommends that all applications, requests for testing accommodation and supporting documentation be sent to the NBOME (8765 W. Higgins Road, Suite 200, Chicago, IL 60631) by a traceable means of delivery (e.g., UPS, FedEx, or Certified Mail), and that the candidate retain a copy of all materials submitted to the NBOME.

Because the NBOME cannot determine that a score produced by a time-accommodated examination is comparable to a score produced for the same examination administered under standard time conditions, the NBOME annotates Score Reports, transcripts and other reports to indicate whether an examination administered on or after July 1, 2007, was taken by the candidate under standard time (S) or non-standard time (N) conditions.

If an application for a test accommodation is not complete or does not include all required supporting documentation described in the instructions available to the candidate, the application will be held subject to the candidate providing additional information within 30 days of the date the candidate is notified. If there are deficiencies in the application or documentation, the candidate is referred to the published instructions (including any available and applicable guidelines) and may be informed only of the *type* of information or documentation required by the NBOME to make an informed decision on the candidate's request. If complete information and documentation is not provided to the NBOME within the required period, the application will not be approved.

#### Notification

If the request for a test accommodation is approved by the NBOME and the candidate is notified in writing of that approval then:

For COMLEX-USA Level 1, Level 2-CE, or Level 3: The candidate must directly contact the NBOME's Client Services office by phone (773-714-0622 or toll-free at 866-479-6828); to obtain instructions regarding registration and/or scheduling or rescheduling to take the examination with the approved testing accommodation.

For COMLEX-USA Level 2-PE: The candidate must contact the NBOME's National Center for Clinical Skills Testing in Conshohocken by phone (610-825-6551 or toll-free at 866-626-6397), to obtain a date to take the examination with a test accommodation and/or reschedule the standard test administration date. COMLEX-USA Level 2-PE testing sessions are often fully scheduled three to four months in advance, so candidates should plan accordingly.

If a candidate is notified in writing that his or her request for a test accommodation was not approved by the NBOME, the candidate may then proceed to take the scheduled examination under standard conditions or schedule online to take the examination without an accommodation.

#### Request for Reconsideration

If an application for an accommodation under the ADA is not approved as requested, and the candidate thereafter obtains *new and compelling data or information* supporting his or her request, the candidate may request that the NBOME reconsider its decision. Any request for reconsideration must be in writing and submitted to the NBOME with the candidate's new and compelling data, or additional information not previously considered by the NBOME. The

candidate must also submit a written and rational statement explaining the basis upon which the candidate contends the NBOME's decision should be reconsidered.

If a candidate requests a reconsideration of the NBOME's decision with new and compelling data or additional information, along with a rational statement of the reasons the candidate contends the decision should be reconsidered, that request for reconsideration will be processed the same as if the request is an original application. The NBOME may return to the candidate without further consideration any request for reconsideration that does not meet the requirements of the ADA. All decisions by the NBOME in this regard are final.

#### Special Assistance

Even though a candidate may not be a "person with disability" for purposes of ADA, the NBOME may provide limited special assistance if sufficient notification is provided to the NBOME. Examples of other assistance that may be permitted include but are not limited to the use of ear plugs, dietary needs, or taking of medication. Please see the "Special Assistance" information in the Examination Administration section of this document (Section VI.B. page 21). Note: In cases where special assistance is approved, under no circumstance will any additional time be given to take the examination, nor will the examination or testing conditions be modified in any way that would alter the standards for measurement of the knowledge or skill being tested by the examination.

#### **C. Candidate Rescheduled, Canceled or Missed Scheduled Examination**

The following policies apply if a scheduled COMLEX-USA examination is rescheduled or canceled by a candidate, or if the candidate is considered a "no show" for a scheduled examination.

Any rescheduling or cancellation of a scheduled examination must be completed through the NBOME online registration system, unless otherwise provided in the Bulletin of Information, and is subject to the most current rescheduling, cancellation or forfeiture fees described in this Bulletin of Information. A reschedule or cancellation of a scheduled examination is not effective until received by the NBOME online. The candidate cannot schedule a new COMLEX-USA Level 2-PE examination date until the scheduled examination date is canceled. Rescheduling of an examination is subject to the availability of the testing center.

The current NBOME policies and fees which a candidate will incur if he or she reschedules, cancels, or fails to show for a scheduled examination are the following:

#### **COMLEX-USA Level 1, Level 2-CE and Level 3 Examinations**

A candidate may reschedule or cancel a scheduled COMLEX-USA Level 1, Level 2-CE or Level 3 examination in accordance with the following policies:

**More Than 30 Days Before Scheduled Examination – Reschedule or Cancellation:** A candidate may reschedule or cancel online a scheduled examination at any time more than 30 days before a scheduled examination without incurring a rescheduling or cancellation fee.

**Between 30 Days To And Including 5 days (120 Hours) Before Scheduled Examination – Reschedule or Cancellation:** A candidate may reschedule or cancel online a scheduled examination at any time from 30 days to and including 5 days before the start of a scheduled examination. If the candidate reschedules the scheduled examination during that period the candidate must pay directly to the testing vendor a rescheduling fee as determined by the testing vendor to reschedule the examination. The current rescheduling fee is \$85.00. If the candidate cancels the scheduled examination in the timeframe noted above, the NBOME will issue a voucher for his or her registration fee (less the cancellation

fee of \$85.00). To reschedule the examination the candidate must use the voucher Issued and pay the \$85.00 reschedule fee.

**Less than 5 days (120 Hours) To And Including 24 Hours Before Scheduled Examination:** A candidate may only cancel a scheduled examination at any time less than 5 days (120 Hours) to and including 24 hours before the scheduled examination. If a candidate cancels a scheduled examination at any time that is less than 5 days (120 Hours) to and including 24 hours before the scheduled examination, the candidate will forfeit \$190.00 of his or her registration fee, and will receive a voucher for the balance of the fee. When rescheduling the examination, the candidate must use the voucher issued and pay the \$190.00 reschedule fee.

**Less Than 24 Hours Before Scheduled Examination – Cancellation or "No Show":** If a candidate cancels his or her scheduled examination less than 24 hours before the start of the scheduled examination, fails to show at the scheduled time and place for an examination, or is prohibited by the NBOME or testing vendor from taking the examination for other than irregular conduct, the candidate will forfeit \$225.00 of his or her registration fee. A voucher of the balance of the candidate's registration fee will be generated for rescheduling purposes. To reschedule the examination the candidate must use the voucher issued and pay the \$225.00 reschedule fee.

#### **COMLEX-USA Level 2-PE Examination**

A candidate cannot schedule a new COMLEX-USA Level 2-PE examination date until the scheduled examination date is canceled. A candidate may cancel a scheduled COMLEX-USA Level 2-PE examination and then reschedule in accordance with the following policies:

**More Than 90 Days Before Scheduled Examination – Reschedule or Cancellation:** A candidate may reschedule or cancel online a scheduled examination at any time more than 90 days before a scheduled examination without incurring a rescheduling or cancellation fee. The candidate will receive a full refund of his or her registration fee. To reschedule the examination the candidate must pay the full registration fee.

**90 Days To More Than 30 Days Before a Scheduled Examination – Reschedule or Cancellation:** A candidate may reschedule or cancel online a scheduled examination at any time 90 days to more than 30 days before the start of a scheduled examination. He or she will forfeit \$50.00 of his or her registration fee, and will receive a voucher for the balance of the registration fee. To reschedule the candidate must use the voucher issued and pay the \$50.00 reschedule fee.

**30 Days To More Than 48 Hours Before Scheduled Examination – Reschedule or Cancellation:** A candidate may reschedule or cancel online a scheduled examination at any time 30 days to more than 48 hours before the start of a scheduled examination. He or she will forfeit \$150.00 of his or her registration fee and will receive a voucher for the balance of the registration fee. To reschedule the candidate must use the voucher issued and pay the \$150.00 registration fee.

**48 Hours To And Including the start of the scheduled examination – Reschedule or Cancellation:** A candidate may reschedule or cancel online a scheduled examination at any time 48 hours to and including 24 hours before the start of a scheduled examination. To reschedule or cancel less than 24 hours up until the start of the scheduled examination, the candidate must contact the National Center for Clinical Skills Testing directly by telephone



(contact information listed below). The candidate will forfeit \$400.00 of his or her registration fee as a cancellation fee and will receive a voucher for the balance of the registration fee. To reschedule the candidate must use the voucher issued and pay the \$400 registration fee.

**Start Time of Scheduled Examination – "No Show":** If a candidate fails to show for a scheduled examination, fails to notify the NBOME prior to the start of the scheduled examination, or is prohibited by the NBOME from taking the examination for other than irregular conduct, the candidate is considered a "no show" and will forfeit \$650.00 of his or her registration fee as a cancellation fee. The candidate may request a voucher for the balance of his or her registration fee in accordance with the policies set forth below. To reschedule the candidate must use the voucher issued and pay the \$650.00 registration fee.

A candidate should contact the NBOME National Center for Clinical Skills Testing (610-825-6551 or toll-free at 866-626-6397) immediately if he or she encounters travel or other delays.

#### **Refund Policy**

When an examination is canceled or rescheduled more than 24 hours before the scheduled examination, a candidate will automatically receive a voucher for the examination cost, minus the applicable cancellation or rescheduling fee. When a **COMLEX-USA cognitive examination (Level 1, Level 2-CE, Level 3)** is canceled or rescheduled less than 24 hours before the scheduled examination date, or is missed, a candidate is entitled to a voucher for the balance of his or her registration fee for a canceled or missed scheduled examination, as provided above. When a candidate is a "no show" for a **clinical skills examination (COMLEX-USA Level 2-Performance Evaluation)** a candidate is entitled to a voucher for the balance of his or her registration fee for a missed scheduled PE examination, as provided above. In both these instances, the NBOME must receive a written request from the candidate within 30 days following the date of the canceled or missed examination for refund of the balance of the registration fee. If such a request is not submitted by the candidate and received by the NBOME within that 30-day period, the candidate will forfeit his or her right to a refund of any portion of the registration fee for the canceled or missed scheduled examination and shall have no recourse against the NBOME.

#### **Irregular Conduct and Registration Fees**

If a candidate is prohibited from taking or completing a scheduled examination because of irregular conduct, the candidate will forfeit his or her entire registration fee. If and when a candidate is eligible to reschedule the examination, the candidate must pay the full registration fee. The candidate may not reschedule the examination until after the missed scheduled examination date. See Section VI.I. on page 28 of this Bulletin for additional information.

#### **Request for Waiver of Portion of Rescheduling or Cancellation Fee**

**COMLEX-USA Level 1, 2-CE or 3 Examination.** If a candidate cancels a scheduled COMLEX-USA Level 1, 2-CE or 3 examination 5 days or less before the scheduled examination or is considered a "no show" because of circumstances beyond his or her control, and submits to the NBOME, no later than 30 days following the administration of the canceled or missed examination, a written request for waiver of a portion of the cancellation fee, the NBOME in its sole discretion may waive up to 50% of that cancellation fee.

**COMLEX-USA Level 2-PE Examination.** If a candidate reschedules or cancels a scheduled COMLEX-USA Level 2-PE examination 48 hours or less before the start of the scheduled examination or is considered a "no show" because of circumstances beyond his or her control, and submits to the NBOME no later than 30 days following the administration of the canceled or missed examination a written request for waiver of a portion of his or her rescheduling or cancellation fee, the NBOME may in its sole discretion waive up to \$250.00 of that rescheduling or cancellation fee.

If a candidate requests a waiver of a rescheduling fee, the candidate must include with such request a written statement of the reason(s) for the waiver request and provide to the NBOME all documentation requested by the NBOME before any such request will be considered by the NBOME.

**D. Candidate Ineligible for Scheduled Examination**

If prior to the administration of a COMLEX-USA examination a candidate who has scheduled the examination is, or becomes, ineligible for any reason to take that examination, the candidate may not take the scheduled examination. The candidate or his/her dean shall promptly notify the NBOME in writing (email: [clientservices@nbome.org](mailto:clientservices@nbome.org)) of his/her ineligibility. The examination will be canceled upon notification to the NBOME by the candidate or his/her dean that the candidate is ineligible to take the examination. For purposes of any refund, the examination shall be deemed to have been canceled on the date the candidate or dean notifies the NBOME in writing of his/her ineligibility to take the examination.

**E. Re-Taking Failed Examination**

A candidate who has received a failing score on a COMLEX-USA Level 1, Level 2-CE, Level 2-PE, or Level 3 examination may schedule another examination after receiving his or her score. To re-take a failed examination, the candidate must register and schedule online a new test date and meet the eligibility requirements when he or she registers to re-take the examination and on the date of the examination.

A candidate may take (including re-takes) the COMLEX-USA Level 1, Level 2-CE or Level 3 examination a maximum of four times in any 12-month period. A candidate may take the COMLEX-USA Level 2-PE examination a maximum of three times in any 12-month period.

A candidate who has failed any accommodated COMLEX-USA examination and desires a test accommodation in connection with his or her re-take must notify the NBOME in writing (including e-mail) of his or her desire to retain the accommodation previously approved, including a representation by the candidate that his or her physical or mental impairment that was the basis, or the candidate's prior accommodation has not substantially changed, before registering to re-take the failed examination.

A candidate who has failed a COMLEX-USA examination during which he or she did not have an accommodation, and who subsequently wishes to request a test accommodation, must contact the NBOME to apply for accommodation to register for and schedule an accommodated re-take of a failed examination, and may not register and schedule an accommodated examination online.

A candidate may not re-take any level of COMLEX-USA to improve his or her score or for any purpose other than to pass a previously failed or voided examination.

**NOTICE of NEW POLICY:**

Effective July 1, 2016, candidates taking COMLEX-USA examinations will be limited to a total of six (6) attempts for each examination (COMLEX-USA Level 1, Level 2-CE, Level 2-PE and Level 3), including but not limited to all attempts prior to July 1, 2016.

**VI. EXAMINATION ADMINISTRATION****A. Testing Centers and Dates**

The COMLEX-USA Level 1, Level 2-CE, and Level 3 examinations are delivered at more than 300 test centers located within all 50 states of the United States and Canada. The exact location of test centers and availability of the sites for the scheduled test dates can be viewed online after registering for the examination.

The COMLEX-USA Level 2-PE examination is administered only at NBOME's National Center for Clinical Skills Testing (NCCST), 101 W. Elm Street, Conshohocken, Pennsylvania (near Philadelphia). Availability of test dates for the COMLEX-USA Level 2-PE examination may be determined online or by contacting the NCCST.

**B. COMLEX-USA Level 1, Level 2-CE, Level 3**

The following policies apply to the administration of the COMLEX-USA Level 1, Level 2-CE and Level 3 examinations:

**Arrival and Identification**

Candidates should arrive 30 minutes prior to the start of the scheduled test administration, and must bring with them one (1) piece of identification, which must be a valid government-issued picture ID with signature, such as a current driver's license or passport. The ID must be original, in good condition, in Roman English characters and contain a photo which is recognizable and matches the candidate. Testing center staff has sole discretion for determining the validity and acceptability of the ID presented and has discretion of determining non-compliance. As part of the candidate's identification processing, the driver's license or passport will be scanned in order to retain scanned information. A candidate's name on the registration and the valid government-issued picture ID must be exactly the same. Candidates are required to have a digital photo taken and provide a biometric ID (fingerprint) to enter and exit the test center. Candidates should dress comfortably as the examination may take the full day. Candidates requiring the use of hearing aids or earplugs during testing must contact the NBOME prior to their test date. Candidates are not permitted to bring food or drink into the test area of the center. If a candidate requires food or drink during the testing period, he or she may request an unscheduled break. However, all time for an unscheduled test break(s) will be charged against the allocated test session time.

Any candidate who presents to the test center for a scheduled examination but does not produce at least one appropriate form of identification, which is a current and valid government-issued picture ID, will not be permitted to take the examination and must schedule a new appointment for the examination as if he or she had failed to appear for the examination without prior notice to the NBOME ("no show"). The candidate will incur a fee to reschedule the new test appointment as "no show," in accordance with the fees established in this Bulletin of Information.

The NBOME utilizes the personal information entered by the candidate into the NBOME web-based electronic registration system to verify the identity of the candidate taking the examination. Therefore, a candidate whose name is changed by marriage or for some other reason must notify the NBOME at least five (5) business days in advance of testing if he or she is to be tested under the new name. Any candidate presenting an ID that does not match the name in the NBOME web-based electronic registration system will not be permitted to take the examination and will be considered a "no show" for all purposes.

#### Late Arrival

Any candidate who arrives at the designated test center within 30 minutes after the scheduled start time for a COMLEX-USA Level 1, Level 2-CE or Level 3 examination and requests to take the examination will be permitted to do so, but only if the test center is able to deliver the examination in its entirety.

Any candidate who arrives more than 30 minutes past the scheduled start time may take the examination at the sole discretion of the proctor or testing vendor at the test center. A candidate will only be permitted to take the examination if the test center is able to deliver the examination in its entirety. Any candidate who arrives later than 30 minutes and is not permitted to take the examination shall be considered a "no show."

#### No Outside Information or Access to Personal Items

During the full test session, a candidate will not be permitted access to any information or data not provided to the candidate by the NBOME or the testing vendor at the test center, including but not limited to any access to a cellular phone or PDA, text, notes or other materials, and may not communicate in any manner with anyone outside the testing center. **Candidates are required to place all personal property, including watches, in the secure lockers provided at the test centers.** Candidates are permitted to access their personal property during the lunch time between sessions, but not during scheduled or unscheduled breaks. Please refer to the Prometric website "What to Expect on Test Day Using Biometric-enabled Check-In."

#### Unaccompanied

A candidate may not have in the test area assigned to the candidate any family member, assistant or other person for any reason except as specifically approved by the NBOME as a test accommodation.

#### Special Assistance

Even though a candidate may not be a "person with disability" for purposes of ADA (see test accommodation policy above), the NBOME may provide limited special assistance if sufficient notification is provided to the NBOME. The proctor of a COMLEX-USA Level 1, Level 2-CE or Level 3 examination may permit or provide special assistance in accordance with the business parameters established between the testing vendor and the NBOME; however, under no circumstance may a proctor permit any additional time to take the examination or modify the examination or testing conditions in any way that would alter the standards for measurement of the knowledge or skill being tested by the examination. Examples of other assistance that may be permitted include but are not limited to the use of ear plugs, dietary needs, or taking of medication.

#### Leaving Test Area

If a candidate leaves his or her assigned test area during the administration of these COMLEX-USA examinations without permission, the NBOME may in its sole discretion determine whether "irregular conduct" occurred. If the NBOME determines that "irregular conduct" occurred, the



examination may in the sole discretion of the NBOME be voided, not scored or face other action, as determined by the NBOME (see also II.A.8, page 2), and "Irregular conduct" noted on the candidate's score report and transcript.

If in the opinion of the NBOME a candidate leaves the test area because he or she is unable to complete an examination due to a significant illness, the NBOME may in its sole discretion void and not report the examination, and, upon written request of the candidate within 30 days of the date of the examination, with appropriate documentation as may be required by the NBOME, permit the candidate to schedule a new test date without payment of an additional fee.

Regardless of the reason the candidate left the assigned test area, if the candidate is permitted to continue with the examination he or she will not be granted any additional time to complete the examination.

#### Computer Program Malfunction

If any COMLEX-USA cognitive examination (Level 1, Level 2-CE, Level 3) does not launch or malfunctions, including but not limited to test form not assigned, or missing test items or portions of test items (including visuals, graphics and/or text) during the administration of the examination such that the completeness, integrity or security of the examination is compromised for any candidate, the examination of the candidate(s) adversely affected may be voided by the NBOME and any answers to the extent completed not scored; provided, in lieu of voiding the examination, the NBOME in its sole discretion may accept and score the candidate's examination provided he or she executes in a form satisfactory to the NBOME a verified statement that he or she was unaffected by the malfunction, expressing desire to have his or her examination scored, agrees to accept the results of the examination, and waives any claim arising out of or relating to the examination.

A malfunction occurring during the administration of an examination will presumed to have compromised the completeness, integrity or security of the examination if the malfunction lasts longer than 60 minutes or in the opinion of the NBOME otherwise significantly alters the content or construct specifications for the examination. If the examination is voided by the NBOME the candidate may schedule a new test appointment at the next available time to test without incurring additional fees.

If the NBOME in its sole discretion determines that the completeness, integrity or security of the candidate's examination was not adversely affected by a malfunction, the examination will be scored and reported the same as if the malfunction had not occurred.

Any candidate required to schedule a new test appointment and take an examination because of any malfunction during the administration of the examination may schedule a new test appointment at the next available date, without payment of any additional fee. The NBOME may reimburse candidates for travel and lodging expenses up to \$150. The candidate must apply for such reimbursement of expenses in writing within 30 days of the event to the NBOME, and must provide appropriate receipts and any other information requested by the NBOME, in order to be considered for any reimbursement for such expenses.

#### Interruption of Examination

Unanticipated circumstances may arise including, but not limited to, fire alarm, evacuation, weather emergency, power failure, software failure, equipment failure, and forced evacuation which may require a test center to close immediately before or during the administration of an examination. If the proctor stops all testing, the candidates must stop further work on the examination. Candidates must obey all proctor instructions and testing center placards for the

safety of all affected by the emergency. Depending on the time required to restore a safe testing environment, the proctor or testing vendor will determine whether or not to resume testing.

**A candidate must promptly report any interruption of the examination to the test center staff on the day of the examination AND provide directly to the NBOME ([clientservices@nbome.org](mailto:clientservices@nbome.org)) credible and verifiable written evidence of the interruption within ten (10) business days following the date of the examination. See Section VI.F on page 26.**

The proctor or testing vendor will determine whether the examination will resume from the point when the examination was stopped. If the examination interruption will still permit the examination to be administered in its entirety.

If the examination is interrupted for a period of time that will not permit the examination to be administered in its entirety, or the examination is canceled for emergency or safety purposes, any portion of the examination to the extent completed will be voided and not reported, and a new appointment to take the examination will be scheduled without any additional fee.

If an interruption occurs after the morning test session has been completed, and the examination cannot be resumed or there is insufficient time to permit the afternoon session to be administered in its entirety, the candidate will be required to schedule a new appointment to take the examination in its entirety. All responses to the extent the examination is completed will be voided and not reported. The new appointment to take the examination will be scheduled without any additional fee.

When an examination is interrupted and cannot be resumed and administered in its entirety, the candidate may be eligible to receive a reimbursement for travel and lodging expenses up to \$150 from the NBOME. The candidate must apply in writing for a reimbursement within 30 days of the event, and must provide to the NBOME appropriate receipts and any additional information requested by the NBOME, in order to be considered for reimbursement of such expenses.

#### Missing Data or Score

If a candidate's score or data from a COMLEX-USA Level 1, Level 2-CE or Level 3 examination is missing for any reason, including but not limited to electronic loss or transmission or computer failure, no score will be recorded or reported for the candidate.

The candidate may reschedule the examination for the next available test date without any additional fee.

When an examination cannot be scored or reported because of missing score or data the candidate may be eligible for reimbursement of travel and lodging expenses up to \$150 from the NBOME. The candidate must apply in writing for a reimbursement within 30 days of the event, and must provide to the NBOME appropriate receipts and any additional information requested by the NBOME, in order to be considered for reimbursement of such expenses.



**C. COMLEX-USA Level 2-PE (Performance Evaluation)**

The following policies apply to the administration of the COMLEX-USA Level 2-PE examination:

**Arrival and Identification**

Candidates for the COMLEX-USA Level 2-PE should arrive at the NBOME National Center for Clinical Skills Testing in Conshohocken, Pennsylvania, at least 30 minutes prior to the start of the scheduled examination to anticipate and allow for travel delays common to the greater Philadelphia area.

Candidates are required to bring a government-issued legal photo identification card (such as a current driver's license or passport), and a printed confirmation page for the test session. The ID must be original, in good condition, in Roman English characters and contain a photo which is recognizable and matches the candidate. Testing center staff has sole discretion for determining the validity and acceptability of the ID presented and has discretion of determining non-compliance. A candidate's name on the registration and the valid government-issued picture ID must be exactly the same. Candidates are required to have a digital photo taken and may also be required to provide a biometric ID (fingerprint) as part of the registration process.

**Late Arrival**

A candidate arriving late who misses the full orientation or part thereof will not be allowed to take the examination unless the candidate acknowledges in writing that he or she missed all or any part of the orientation and confirms that he waives any and all claims, demands, liabilities or obligations of the NBOME arising out of or relating to the taking of the examination, including but not limited to matters covered during the orientation session. In no instance will the candidate be permitted to begin his or her examination after the first clinical encounter starts.

Any candidate arriving late and missing any part of the first encounter will be considered a "no show" and will not be allowed to take that examination. The candidate must reschedule to take the examination and pay all required fees.

**Dress, Food, Equipment, Personal Items**

Candidates should be professionally dressed, including a white lab coat, and are required to provide their own standard stethoscopes. Each candidate will be provided with a boxed lunch at the first of two scheduled examination breaks; they may bring their own food (not requiring reheating) and beverages for use during the breaks if desired. If a candidate has strict dietary needs, it is recommended that he or she bring his or her own food for the examination day. **Candidates are required to place all personal belongings in lockers provided at the test center.**

**Testing Sequence**

Information regarding the testing sequence for Level 2-PE is detailed in the *Orientation Guide* for COMLEX-USA Level 2-PE available at the NBOME's website.

**No Outside Information or Access**

During the full test session, candidates will not be permitted access to any information or data not provided to the candidate by the NBOME at the test center, any access to cellular phones, PDAs, or to otherwise communicate with anyone outside the testing center.

**Unaccompanied**

A candidate may not have in the test area any family member, assistant or other person for any reason except as specifically approved by the NBOME as a test accommodation.

**Special Assistance**

Even though a candidate may not be a person with disability for purposes of ADA (see test accommodation policy above), the NBOME may provide limited special assistance if sufficient notification is provided to the test center, but such special assistance may not include any additional testing time or any other alteration of the examination. All requests for such special assistance will be considered on an individual basis. These may include, but are not limited to, dietary needs, taking medication, breast pumps, or checking blood glucose during the exam. Necessary items may be stored in the Candidate Orientation Room or kept by staff in the testing center. A candidate must make the request prior to the testing date and must provide documentation indicating a need for such a request.

**Leaving Testing Center (NCCST)**

A candidate will not be allowed to leave the clinical skills testing center (suite with examination rooms, SOAP note desks, break room, and restrooms) during the administration of the examination unless permitted or required to do so by the NBOME.

If a candidate leaves the assigned testing area without permission during the administration of the COMLEX-USA Level 2-PE examination, a failing score and "Irregular Conduct" for unprofessional conduct will be entered on the candidate's score report and transcript for that examination; provided, however, if the candidate left the assigned testing area because of a serious illness or other unforeseeable emergency the candidate may, within ten (10) days following the examination, submit to the NBOME Vice President for Clinical Skills Testing a written request that he or she not be assigned a failing score, explaining in detail why the illness or emergency caused the candidate to leave the test area, with adequate supporting documentation, which the NBOME in its sole discretion may accept or reject.

**D. Cancellation Due to Inclement Weather or Other Force Majeure**

In the event of severe inclement weather, *force majeure* or other event beyond the control of the NBOME or its testing vendor, the NBOME or its testing vendor may in its sole discretion cancel a scheduled examination. If this occurs, candidates scheduled to take that examination may schedule a new appointment to test at the next available date without additional fee. The NBOME or testing vendor will, when feasible, make information available to candidates on the status of the examination. Candidates will not be reimbursed for any travel or lodging expenses in the event that a test is canceled under these circumstances.

For information about the possible cancellation of an examination, candidates should visit the testing vendor's website or call 800-853-6769 to learn if the test center will be open for test administration.

The specific test center contact information for a COMLEX-USA Level 1, Level 2-CE or Level 3 examination is provided on the electronic receipt candidates receive as confirmation of a scheduled test date. Candidates should retain a copy of the receipt for future reference.

The telephone number of the NBOME National Center for Clinical Skills Testing (NCCST) for the COMLEX-USA Level 2-PE examination is 610-825-6551, toll-free at 866-626-6397, or the Power-independent Emergency Line at 610-825-4240. The NCCST may also make available to candidates a recorded message regarding the status of the examination.

**E. Emergency and Evacuation**

In the event of an emergency during the administration of a COMLEX-USA examination, the NBOME (either directly or through its contracted vendors), will endeavor to protect the safety of

all candidates and staff while preserving the integrity of the examination. All candidates are required to follow the proctor's or administrator's instructions and obey test center placards for their safety and the safety of others.

If as a result of the emergency or evacuation, the examination cannot be completed in its entirety or the data from the examination are irretrievable, the examination to the extent that it has been completed will be voided and not reported. The candidate may schedule a new appointment to test at the next available test date without incurring an additional fee. No reimbursement of travel or lodging expense is offered by the NBOME in this instance.

If a candidate has completed the examination in its entirety prior to the emergency or evacuation, and the data from the examination are retrievable, the candidate's examination will be scored and reported.

**F. Required Notifications of Any Adverse Condition**

If any program malfunction, failure or interruption, adverse testing condition or other event or condition occurs ("Adverse Condition") during the administration of any COMLEX-USA examination to a candidate, **the candidate must notify the test center staff prior to leaving the test center of any adverse impact the Adverse Condition had or may have had on the candidate's performance of the examination, and, in addition, within ten (10) days following the examination date submit to the NBOME in writing at [clientservices@nbome.org](mailto:clientservices@nbome.org) or NBOME, 8765 W. Higgins Road, Suite 200, Chicago, IL 60631, a description of the Adverse Condition, a detailed statement of the impact the Adverse Condition had or may have had on his or her performance of the examination, and a written request that the NBOME hold the publication of the candidate's score on the examination until the NBOME has completed its investigation of the matter, as a condition for any claim or right to recourse the candidate may have against the NBOME, the testing vendor, or their employees, agents or representative. If the candidate fails to so notify both the test center staff and the NBOME, the candidate thereby waives any claim or right to any recourse he or she against the NBOME, the testing vendor, or their employees, agents or representatives.**

**G. Adverse Testing Conditions**

The following policies apply in the event any adverse testing condition (e.g., unreasonable and substantially distracting noise or other activity) occurs or is alleged to occur during the administration of any COMLEX-USA examination.

If conditions at a test center are universally adverse to all or most candidates, as determined by the NBOME in its sole discretion, the NBOME may offer to all candidates so affected an option to reschedule the examination for the next available test date without the candidate incurring any additional fee. If the NBOME is unable to reschedule the examinations when this option is offered, then it is the responsibility of the candidate to make the new test appointment for the next available test date.

If the test center is closed due to adverse testing conditions (except inclement weather, other force majeure or emergency evacuation noted above), the candidate may be eligible for reimbursement of travel and lodging expenses from the NBOME for up to \$150. The candidate must apply to the NBOME in writing within 30 days following the event, and must provide appropriate receipts and any additional information requested by the NBOME to be considered for any reimbursement for such expenses.

If the test center is not closed but the candidate believes that the testing conditions have or will substantially and adversely affect his or her performance on the examination, the candidate must immediately bring that circumstance to the attention of the test center staff **AND** provide directly to the NBOME credible and verifiable written evidence of an adverse testing condition within ten (10) business days following the date of the examination. A candidate who fails to complete both steps waives any objection to the testing conditions of the examination, and shall have no recourse against the NBOME, its testing vendor or their employees, agents or representatives.

If during an examination a candidate brings to the attention of a proctor any testing condition (e.g., program malfunction, interruption of examination, and adverse testing condition) that he or she believes has or will substantially and adversely affect his or her performance on the examination, and the condition is not resolved to the satisfaction of the candidate at the test site, the candidate may:

(1) **Continue examination.** After notifying the proctor, the candidate may elect to continue with the examination. In such a case, the following shall apply:

(a) **Adverse Condition Confirmed:** If the test center staff verifies to the satisfaction of the NBOME that the condition complained of did exist and the NBOME determines that it likely would have substantially and adversely affected the candidate's performance of the examination, the candidate may reschedule the examination for the next available date and will not be assessed any additional fee. The examination to the extent completed will be voided and not reported. Section F: Required Notifications of Any Adverse Condition applies.

(b) **Adverse Condition Not Confirmed:** If the test center staff does not verify to the NBOME's satisfaction that the condition complained of existed, or that it existed but did not or would not have substantially and adversely affected the candidate's performance on the examination, the examination will be scored. For the COMLEX-USA Level 2-PE, this action on the part of the examination may result in a failing score report as detailed in Section VI, C, page 25.

(2) **Withdraw from Examination for Adverse Testing Conditions.** If after notifying the proctor the candidate chooses to withdraw from the examination due to adverse testing conditions prior to its completion, the examination shall be voided and not scored, and the following shall apply:

(a) **Adverse Condition Confirmed:** If the test center staff verifies to the NBOME that the condition complained of did exist, and the NBOME determines that it would have substantially and adversely affected the candidate's performance of the examination, the candidate may reschedule the examination for the next available date and will not be assessed any additional fee. The examination to the extent completed will be voided and not reported.

(b) **Adverse Condition Not Confirmed:** If the test center staff does not verify to the NBOME's satisfaction that the condition complained of existed, or that it existed but the NBOME determines that it would not have substantially and adversely affected the candidate's performance on the examination, the NBOME may in its sole discretion, elect to score the examination or to not score the examination and permit the candidate to re-take the examination. Section F: Required Notifications of Any Adverse Condition applies. In such a case, the candidate may not reschedule to take the examination



within 60 days of the date of the examination, must pay a full examination fee, and may not elect to withdraw from any future COMLEX-USA examination.

If the candidate believes he or she has been impacted by an adverse test condition and withdraws from the examination prior to its completion, refer to Section F: Required Notifications of Any Adverse Condition as it applies. The candidate must directly provide to the NBOME within ten (10) days following the date of his or her withdrawal credible and verifiable written evidence of the adverse testing condition, in addition to immediately reporting such circumstance to the test center staff at the time of the examination. Please note that making a comment in the post-examination survey regarding adverse testing conditions does not qualify as written notification.

#### **H. Change of Eligibility Status**

If the NBOME is notified that a candidate was ineligible to take a COMLEX-USA examination after the examination was administered but before it is scored or before the score is released, the candidate's examination will be voided and no score released, and the candidate's record and transcript will reflect the administration with no score. If the NBOME determines that irregular conduct occurred, the candidate's record and transcript may be annotated to show that irregular conduct occurred.

Notwithstanding the foregoing, if the candidate did not know that he or she was ineligible to take the examination at the time the examination was taken and the candidate scheduled and took the examination in good faith, as determined by the NBOME in its sole discretion, the examination will be voided and the NBOME may refund up to one-half of the fees paid by or for the candidate for that examination if the candidate submits in writing a request for the refund, with a written explanation satisfactory to the NBOME, within 30 days of the date the candidate was notified that he or she was ineligible to take the examination. Otherwise, all fees paid by or for the candidate will be forfeited.

#### **I. Irregular Conduct**

If the NBOME determines in its sole discretion that a candidate committed or contributed to any Irregular Conduct in connection with the application, registration or taking of an examination, the NBOME may void the candidate's examination or score, deem the candidate to have "failed" the examination and enter a "Fail" score on the candidate's Score Report and transcript, annotate the candidate's Score Report and transcript for the examination as "Irregular Conduct," suspend, revoke, or refuse to provide any Score Report or transcript to a candidate or any third party, deny any application by the candidate to take any NBOME examination, report the incident to the candidate's school or graduate medical education program and/or to any licensure board, state or national jurisdiction, or agency or authority, and/or take any other action the NBOME in its sole discretion deems appropriate.

The candidate agrees to fully cooperate with any NBOME investigation of any possible irregularities in test administration, candidate behavior, breach of test security or confidentiality, and failure to fully cooperate can result in sanctions, including examination failure, notation of irregular conduct, suspension of eligibility or permanent loss of eligibility to challenge a future COMLEX-USA examination.

If a candidate's examination is not scored or any score is voided because of Irregular Conduct, the NBOME may in its sole discretion deem that the candidate "failed" the examination and note a "Fail" score on the candidate's record and transcript.

The term "Irregular Conduct" includes any behavior on the part of any candidate that violates the integrity or security of the examination, behavior that is disruptive to the administration of the examination, or behavior deemed by the NBOME in its sole discretion to be inappropriate in connection with the application, registration, taking, administration, integrity, and security of any NBOME examination. Such behavior includes but is not limited to:

- Copying, fraud, deceit or other dishonest conduct.
- Refusal to provide proper ID or permit photo documentation or other identification for ID verification at any time.
- Disrupting another candidate or candidates.
- Verbal or physical harassment of any employee or representative of the NBOME or the testing vendor at any time (i.e., before, during, or after any examination).
- Communication or attempts to communicate with others during the examination other than authorized proctors or staff.
- Removal of or attempts to remove any test material, scrap paper or white board from the assigned test area.
- Damage to property.
- Providing or receiving unauthorized information about the content of an examination.
- Communication or attempts to communicate about the content, format or specific test items with another candidate or with any outside source or party (including use of telephones, personal computers, Internet access, test review companies, or any other means) at any time, either before, during or after any examination.
- Using or having available or access to any unauthorized device, text, note or other material that could assist the candidate in taking the examination.
- Providing false admittance information or altering applications, score reports, transcripts or certificates.
- Providing false or forged identification upon presentation for testing at a test center.
- Misrepresentation of physical examination or treatment maneuvers performed or history taken during a standardized patient encounter in the SOAP note or other documentation required for the COMLEX-USA Level 2-PE examination. With the exception of vital signs provided, under no other circumstances should a candidate document the results of physical examination or treatment maneuvers that were not performed or medical history that was not elicited during the clinical encounter. Documenting results of physical examination or treatment maneuvers that were not performed or medical history that was not elicited will be considered Irregular Conduct.
- Verbally or physically harming or threatening to harm a proctor, other examinees, test center employees, NBOME personnel or their agents, including telephone encounters regarding scheduling, scores or score reporting.
- Violation of the NBOME's non-disclosure or confidentiality policies or the candidate's non-disclosure agreement at any time.
- Any violation of the Terms and Conditions, policies, rules, procedures or obligations of candidates set out in the Bulletin of Information as published at the time of the violation.
- Bringing personal property into the test area is considered by the NBOME to violate the security of the examination.
- Leaving his or her assigned test area, during the administration of any COMLEX-USA examination.
- Other behavior as deemed by the NBOME to be unethical or unprofessional.

**Candidates are under both proctor and electronic surveillance during the administration of the COMLEX-USA examinations at all test centers.**



The proctor or testing vendor who suspects Irregular Conduct by a candidate during the administration of the COMLEX-USA Level 1, Level 2-CE, or Level 3 will report that information to the NBOME. Also, candidates who directly observe Irregular Conduct must report such activity to the proctor, the testing vendor or the NBOME.

The NBOME reviews all Irregular Conduct reports and may pursue any and all actions it deems appropriate for or in connection with any Irregular Conduct, including but not limited to any damages or losses incurred by the NBOME, including its reasonable attorneys' fees and costs, caused by the candidate's Irregular Conduct, and injunctive or other equitable relief without bond or other security.

Copying, reproducing, verbally discussing, relaying or recording test items or test content, in addition to violating security, may result in action by the NBOME against the candidate for violation of copyright laws and/or other action by the NBOME allowed by law.

Prior to taking the COMLEX-USA Level 2-PE examinations, candidates must sign a Candidate Agreement, which includes confidentiality obligations, and may be provided with further examples of Irregular Conduct during the orientation. Behavior that may violate NBOME policy or provide an advantage to one candidate over others (e.g., failure to stop documenting a SOAP note when the allotted time has ended) may result in disqualification of that item from scoring (i.e., minimum note score).

A candidate who is notified that he or she has engaged in Irregular Conduct or is being investigated for alleged Irregular Conduct will have ten (10) days from the date of such notification to submit in writing to the NBOME any and all information known or available to the candidate that he or she believes is relevant to the matter. After the period of time provided to the candidate to submit information or evidence, the NBOME will finally determine whether the candidate has engaged in Irregular Conduct and, if so, what action will be taken by the NBOME. Notwithstanding the foregoing, the NBOME may in its sole discretion take any action it deems appropriate prior to the submittal of any information or evidence by the candidate.

Decisions regarding Irregular Conduct are determined solely at the discretion of the NBOME and all such decisions of the NBOME are final.

Due to the nature of the process involved in reports of Irregular Conduct of a candidate or investigation of such conduct or any complaint in connection with the administration of a COMLEX-USA examination, an investigation of any actual or suspected Irregular Conduct may delay the release of any score of a candidate. The NBOME will not release a score, if any, while the examination taken by the candidate is under investigation.

Information relating to any Irregular Conduct or behavior of a candidate and any action taken by the NBOME in response to a candidate's Irregular Conduct or behavior may become part of the permanent record of the candidate maintained by the NBOME and available to third parties. The NBOME may without notification to or permission of the candidate release any or all of the candidate's information or action(s) taken by the NBOME relating to the candidate's Irregular Conduct or behavior to any authority, agent of an authority or other persons or legal entities deemed appropriate by the NBOME or required by law.

#### **J. Other Unprofessional Conduct**

The NBOME deems professionalism to be an important competency of an osteopathic physician, and a candidate must demonstrate professionalism at all times. The NBOME will not tolerate

unprofessional conduct on the part of any candidate under any circumstance, including but not limited to the following:

- Use of foul, lewd, improper or culturally insensitive statements in the comment dialog box provided on the computer-based examinations, or in the SOAP notes portion of the clinical skills examination.
- Use of foul, lewd, improper or culturally insensitive language in or near a test site.
- Use of foul, lewd, improper or culturally insensitive language, actions, or behavior when addressing the NBOME, an agent or employee of the NBOME or the testing vendor in person, by telephone, by email, or by written contact.
- Any conduct or behavior deemed by the NBOME to be inappropriate or unprofessional for an osteopathic physician.
- Violation by the candidate of any of the Terms and Conditions as set out in the NBOME Bulletin of Information as published when the violation occurred or the most recently published Bulletin of Information, whether occurring before or after the administration of a COMLEX-USA examination to the candidate.

When any unprofessional conduct comes to the attention of the NBOME, the NBOME at its sole discretion may take any action it deems appropriate, including, but not limited to, the following:

- Record the name of the candidate, nature of the behavior or conduct and the time and conditions under which the behavior or conduct occurred.
- Notate the candidate's record to reflect the unprofessional conduct.
- Record and store conversations or other documentation that are considered to be unprofessional.
- Record the punitive action, if any, taken against a candidate including, but not limited to a period of suspension or denial of testing by the NBOME.
- Void and/or not score any examination taken by the candidate, deem the candidate to have failed the examination, report "Fail" as the result of the examination, and annotate the candidate's Score Report and/or transcript for the examination as Irregular Conduct.
- Seek an opportunity to create a "teaching" and "learning" experience from such encounters of unprofessional conduct, behavior or use of language so as to benefit the candidate including, but not limited to, notification of the dean of the college of osteopathic medicine and/or the director for medical education of the graduate medical education program in which the candidate is matriculated or enrolled.

As with other Irregular Conduct, information relating to a candidate's unprofessional conduct may become part of the permanent record of the candidate maintained by the NBOME. The NBOME may in its sole discretion without notification to or permission of the candidate release any or all of the candidate's information or action(s) taken by the NBOME relating to the candidate's Irregular Conduct to any authority, agent of an authority or other persons deemed appropriate by the NBOME or as required by law.

#### **K. Security and Confidentiality**

All examinations, examination materials, answer sheets, grading materials and clinical materials used in the COMLEX-USA examinations or other examinations of the NBOME are the sole property of the NBOME. All examinations of the NBOME are protected by the copyright laws of the United States. Candidates have no right, title or interest in or access to any examination of the NBOME, or to the NBOME's means and methods for test development or its methodology of testing and scoring, or to any data or information relating to any examination of the NBOME. All rights are reserved by the NBOME. Only authorized proctors or other authorized agents or

employees of the NBOME shall have custody or control of the examination and the examination materials.

The NBOME is not affiliated with, does not sanction and does not endorse any commercial enterprise that purportedly offers COMLEX-USA test preparation courses or materials. The best preparation for the COMLEX-USA examination series is to carefully review the information about the examinations provided in the NBOME's most recent Bulletin of Information, as well as additional information provided on the NBOME website. For self-assessment purposes, the NBOME also publishes and makes available to candidates its COMSAE practice examinations, which are available at [www.nbome.org](http://www.nbome.org).

Candidates may have access to the examination only while it is being administered and only under the supervision of authorized proctors. Post-examination access to, discussion of or review by candidates, or any person on behalf of the candidates, of the examination or examination material is strictly prohibited.

Any discussion or disclosure of any aspect of the test items or the clinical cases or standardized patients either during the examination or after the examination is strictly prohibited. Candidates are obligated not to discuss, disclose, paraphrase, publish or otherwise make known to anyone any test item, information relating to any NBOME examination or other confidential property belonging to the NBOME. Any violation by a candidate of this confidentiality agreement will be considered Irregular Conduct and may result in the non-scoring or voiding of the candidate's score and assignment of a "Fail" score and/or other sanctions that the NBOME may impose in its sole discretion. The NBOME will also be entitled to recover from the candidate all its damages and losses, including reasonable attorneys' fees and costs, caused by any Irregular Conduct of the candidate. By registering for and taking an examination of the NBOME, the candidate agrees and acknowledges that NBOME may have no adequate remedy at law and in its sole discretion is entitled to injunctive and/or other relief to prevent or limit any disclosure of test items or other confidential property of the NBOME, in addition to its damages or losses, including its reasonable attorneys' fees and costs incurred by the NBOME as a result of any action taken to defend or protect its confidential property.

**L. Refuse to Administer Examination**

The NBOME may in its sole and absolute discretion refuse to administer or provide any of its examinations to any person, with or without cause. If the NBOME determines not to provide its examination to any person and he or she has registered or scheduled to take an NBOME examination and paid a registration or other fee, the only recourse that person shall have against the NBOME is a refund of the registration or other fee paid by the candidate.

**VII. EXAMINATION SCORES**

**A. COMLEX-USA Level 1, Level 2-CE, and Level 3 - Scoring**

The number of test items answered correctly (the raw score) is converted to a 3-digit standard score and a 2-digit standard score for the purposes of making pass-fail decisions and for reporting the results. The conversion for standard scores involves information about the performance of examinees that have taken these examinations previously.

**Passing Scores:**

COMLEX-USA Level 1: 400 (3-digit standard score) or 75 (2-digit standard score)

COMLEX-USA Level 2-CE: 400 (3-digit standard score) or 75 (2-digit standard score)

COMLEX-USA Level 3: 350 (3-digit standard score) or 75 (2-digit standard score)

The 3-digit standard scores of COMLEX-USA Level 1, Level 2-CE, and Level 3 examinations have a mean of 500.

Items that may be included in the examination solely for research or pre-testing purposes will not be included in the candidate's score.

For information on converting a COMLEX-USA score to a percentile score and using the COMLEX-USA Percentile Score Conversion Tool, [click here](#).

The percentage of candidates that pass or fail a COMLEX-USA examination is not predetermined. The pass/fail standard is criterion-based. The passing score for all COMLEX-USA examinations is based solely on a candidate's performance on the total examination, not on performance on individual content areas. The COMLEX-USA examination score reports include graphical performance profiles summarizing relative strengths and weaknesses for areas designated on the blueprint.

**B. COMLEX-USA Level 2-PE - Scoring**

Detailed information regarding examination scoring for COMLEX-USA Level 2-PE is available in the *Orientation Guide* and also in the COMLEX-USA Level 2-PE Scoring FAQ Report, both of which are on the [website](#). Scoring is criterion-based and reported as Pass or Fail only. To pass Level 2-PE, candidates are required to meet minimal competency standards in two separate clinical skill domains: the Biomedical/Biomechanical Domain and the Humanistic Domain. Successfully passing both domains is required to pass COMLEX-USA Level 2-PE. These include the Humanistic Domain, which is a measure of physician-patient communication, interpersonal skills, and professionalism, as well as the Biomedical/Biomechanical Domain, including history-taking, physical examination, osteopathic principles and osteopathic manipulative treatment, documentation skills (synthesis of clinical findings in a SOAP note format), integrated differential diagnosis, and clinical problem solving. Physician-patient communication and the SOAP notes are required to be in the English language. Candidates who are unsuccessful in meeting the passing standards for either domain may be provided further feedback on their score reports as to areas of relative strengths and weakness.

**C. Setting the Pass/Fail Standard**

Consistent with many other national high-stakes examinations for physician licensure worldwide, the NBOME follows industry standard best practices in determining pass/fail standards for its COMLEX-USA examinations, and for periodic resetting of the standards. Every three to four years, the NBOME reviews the standards for minimum competency required to pass COMLEX-USA examinations. This process, typically referred to as "standard setting," may result in a change in the "cut score" (or scores) needed to pass an examination. The NBOME reserves the right to review the passing standards for any NBOME examinations at any time, and passing standards may be adjusted without notice prior to score reporting. Notice of adjustments is posted on the NBOME website.

To learn more about the NBOME's process for standard setting, visit the [NBOME website](#).



**D. Primary Intended Usage of COMLEX-USA Examination Scores**

The primary intended use of COMLEX-USA is for initial licensure of osteopathic physicians for the practice of osteopathic medicine. Recognized and important secondary uses of the COMLEX-USA examination program include the following: advancement and promotion, including graduation, of students in osteopathic medical schools; direct evidence of student learning and outcomes research by osteopathic medical schools and of residents in graduate medical education programs; uses by residency program directors as part of eligibility criteria for entry into graduate medical education programs; and advancement and promotion, including program completion, of residents in graduate medical education programs. **The NBOME advises against the use of any evaluation instrument for which there is insufficient validity evidence.**

**E. Score Reporting**

Candidates may access their scores for any COMLEX-USA examination through the online registration system at the NBOME website. Account Access Login can be found at the top right corner of the home page. Deans (and their administrative representatives) may access this information for their students using a secure school page of the registration system.

The NBOME will provide the COMLEX-USA Level 1 and Level 2-CE examination Score Reports to the candidate and dean of the candidate's school. The NBOME will provide the COMLEX-USA Level 3 examination Score Reports to the candidate and to the Program Director or Director of Medical Education of the candidate's osteopathic graduate medical education program, if applicable, via the American Osteopathic Association's secure Center for Osteopathic Data on Education (CODE) portal. No COMLEX-USA scores will be reported by telephone, e-mail, or fax. **COMLEX-USA Level 1, Level 2-CE, and Level 3 Score Reports are generally posted to the candidate's account at "View Score Report" and the secure school page within 4 to 6 weeks after the examination administration.**

COMLEX-USA Level 2-PE examination scores will be available electronically to the candidate and the dean or school representative on the NBOME website approximately **8-10 weeks from the date of the examination**, but may be subject to additional delays that are contingent upon candidate scheduling and other variables.

For candidates tested prior to July 1, 2012, a reprint of the Score Report may be requested in writing along with a fee as determined by the NBOME. Fee information can be found COMLEX-USA Level 1, Level 2-CE and Level 3 examinations and here for the COMLEX-USA Level 2-PE examinations.

**F. Score Confirmation**

Prior to releasing examination results and posting the Score Reports, the NBOME conducts a thorough process of quality assurance to ensure that all candidate scores are accurate. However, the NBOME will confirm a COMLEX-USA Level 1, Level 2-CE, Level 2-PE or Level 3 examination score if a candidate so chooses. To request a score confirmation, a candidate must submit a request from the "View Scores" tab of his/her NBOME online account within 120 days of the examination date. Please be advised that there is a \$50 fee per score confirmation request.

For COMLEX-USA Level 1, Level 2-CE and Level 3, score confirmation involves confirmation of responses recorded by computer. The NBOME will ensure that all sections were complete and

that your responses were graded against the proper form. The NBOME does not release information about the scoring of individual examination questions.

Further Information regarding COMLEX-USA cognitive examination score reports can be found within the FAQ on the NBOME website. Candidates are requested to carefully review the information provided prior to contacting the NBOME because further specific feedback will not be provided.

For the COMLEX-USA Level 2-PE examination, score confirmation involves confirmation of the numerical aspects that make up the scores and pass-fail decisions, but does not include further review or re-scoring of the recorded performances or the SOAP notes. Requests for score confirmation for COMLEX-USA Level 2-PE must be submitted directly to the NBOME through the website within 120 of the examination date and must include the \$50 fee for score confirmation.

Further information regarding COMLEX-USA Level 2-PE examination Score Reports can be found in the *Orientation Guide* and also the COMLEX-USA Level 2-PE examination Score Report FAQ. Candidates are requested to carefully review this information prior to contacting the NBOME because further specific feedback will not be provided by the NBOME.

**G. Privacy and Use of Candidate Data**

It is the policy of the NBOME that candidate scores and other confidential data provided by or obtained from the candidate will not be released to any third party except as provided in this Bulletin of Information or at the request of the candidate, or as required by law; provided the NBOME may use a candidate's de-identified score or other candidate data or information for research or other purposes related to the mission of the NBOME without notification to or the permission of the candidate unless and until the candidate specifically notifies the NBOME in writing that his or her score, data and information may not be used by the NBOME for research or other purposes.

**VIII. CERTIFIED TRANSCRIPTS**

**A. Release of Certified Transcripts**

If a candidate wants the NBOME to send his or her scores to a third party, the candidate must submit a written request or electronic request via the online registration system with the appropriate fee. The candidate's scores will be provided in the form of a certified NBOME transcript. No request for a certified transcript will be taken by telephone.

A candidate's NBOME certified transcript may include the following:

- Candidate's complete examination and score history of all Parts/Levels taken.
- Candidate's history of any examinations for which no scores were reported.
- Annotation(s) of the candidate's scores in accordance with NBOME policies.

*The NBOME annotates Score Reports, certified transcripts and other reports to indicate whether an examination administered on or after July 1, 2007 was taken by the candidate under standard time (S) or non-standard time (N) conditions. A Score Report may also be annotated for Irregular Conduct (I).*



The NBOME certified transcript will only reflect the Pass/Fail score for COMLEX-USA Level 2-PE; not numerical scores or percentile rank, and may include other information deemed pertinent by the NBOME.

Graphical performance profiles for the COMLEX-USA Level 1, Level 2-CE and Level 3 examinations are included on the original Score Report but will not be included in a candidate's transcript.

The procedure for requesting a transcript is as follows:

- Order the certified transcript via the online registration system or obtain a certified transcript request form. The certified transcript request form will be available upon request to [clientservices@nbome.org](mailto:clientservices@nbome.org).
- Complete all information required on the request form and submit to the NBOME.
- Pay all required fees by Visa/Master/Discover credit card. Fee information can be found [here for COMLEX-USA Level 1, Level 2-CE and Level 3 examinations](#) and [here for the COMLEX-USA Level 2-PE examination](#).

The NBOME participates in both the Electronic Residency Application Service (ERAS) and the Federation Credentials Verification Service (FCVS).

The candidate's certified transcript is the only verification of scores sent by the NBOME to state licensing boards. The processing of a certified transcript for candidates who have passed the COMLEX-USA Level 3 examination will begin no earlier than two weeks after the original release of scores. Certified transcripts will only be sent upon receipt of a written or electronic request from the candidate, and thereafter the normal processing time applies.

If the NBOME determines that a candidate has committed fraud, deceit, dishonesty, or any other Irregular Conduct, the NBOME may in its sole discretion refuse to issue any certified transcript, or suspend or revoke any certified transcript previously issued.

Except as described in this Bulletin of Information, a candidate's certified transcript will not be provided to the candidate or a third party without the candidate's written request and payment of the certified transcript fee or as required by law.

**B. Processing Time for Certified Transcripts**

Requests for certified transcripts will be processed in the order of the date received by the NBOME. The normal processing time is three (3) to five (5) business days from the receipt date of the request.

All certified transcripts will be mailed via first class mail unless otherwise arranged.

## Exhibit 5

MAY 28 2013

## COMLEX-USA LEVEL 1, LEVEL 2-CE OR LEVEL 3 EXAMINATION

## REQUEST FOR TEST ACCOMMODATION

National Board of Osteopathic Medical Examiners, Inc.

1. Fully read the accompanying instructions. This request and all supporting documentation MUST BE TYPED OR PRINTED. Illegible materials will not be considered.
2. Indicate the examination for which this request is made and fully and completely answer all questions (attach additional sheets if more space is needed to properly and fully respond to these questions).
3. Include all required documentation. See REQUIRED SUPPORTING DOCUMENTATION accompanying this request form.
4. Submit this completed form and Osteopathic Medical School Questionnaire, and all required supporting documentation to the NBOME, 8765 W. Higgins Road, Suite 200, Chicago, IL 60631-4174, Attn: Candidate Services Coordinator.
5. Keep a copy of this request and all other documents, and submit all documents via a traceable or return-receipt method in order to verify timely delivery

NBOME ID #: 952316 Social Security #: 060-76-5500  
 Name: Ajay Bahl  
 Address: 151 Wentworth Ave Phone # (Day): (516) 698-3977  
Albertson, NY 11507 Phone # (Evening):  
 Email Address: abahl@nyit.edu

I request an accommodation for the following COMLEX-USA Examination:

☐ Level 1

☒ Level 2-CE

☐ Level 3

In support of this request, I certify that the following information is true and complete:

1. Impairment. Has a qualified professional determined that you have a physical or mental impairment that substantially limits one or more of your major life activities (i.e., activities that "are central to most people's daily lives") ("Impairment")? Yes ☐ No ☐ If so,

(a) Described each Impairment: #1. Reading Disability (Print Disability) - 1

- (b) Identify each major life activity that is substantially limited by your Impairment:

#1. Due to my reading disability, I am a very slow reader and have to spend an indefinite amount of time

① Reading is substantially limited

(c) Describe in detail how and under what circumstances your Impairment substantially limits your major life activity/activities: Due to my disability, I read at an extremely slow pace and must re-read material. As a result, reading is an arduous, time-consuming process & I have had to work extraordinarily long hours to complete my work.

2. Diagnosis. When was your Impairment diagnosed by a qualified professional?

\* Reading Disability - 8/25/2011. For each diagnosis or treatment of your Impairment by a qualified professional, please separately describe the following:

(a) The name and qualifications of professional(s) diagnosing or treating your Impairment:

Paul B. Yellin MD, Associate Professor, NYU School of Medicine

(b) All treatment, medication and/or remediation you have received for your Impairment:

Treated with Vyvanse for ADHD, but medication does not improve reading fluency

(c) Were you ever informed that you do not have the Impairment? Yes ☐ No ☒ If so, state when you were told, the name, address and qualifications of the professional or other person expressing such diagnosis or opinion, and attach any documentation pertaining to that diagnosis or opinion: \_\_\_\_\_

3. Corrective or Mitigating Measures. Has any corrective or mitigating measure (other than as described in 2(b) above) for your Impairment been provided, prescribed or recommended?

Yes ☒ No ☐ If so, describe all such corrective and/or mitigating measures received or recommended for your Impairment, including dates, nature and results:

recommended: extended time for testing

4. Accommodation(s) Requested. Describe the accommodation(s) that is/are necessary to provide to you access to the examination: double time

and state in detail all reasons you believe this accommodation(s) is/are necessary: \_\_\_\_\_

I am otherwise unable to complete the exam.

5. Prior Accommodation(s). Have you ever previously applied for or received an accommodation for your Impairment? Yes ☐ No ☒ If so, describe all accommodations previously provided, including the date(s) the accommodation was provided and the identity of the school(s) or testing agency/agencies providing you with the accommodation:

(a) Accommodation(s) provided in educational setting prior to medical school/college: \_\_\_\_\_

(b) Accommodation(s) provided in medical school/college: \_\_\_\_\_

(c) Other accommodation(s) provided in connection with any examination or test: \_\_\_\_\_

(d) Describe all examinations you have taken, if any, without an accommodation, including the date(s) or period(s) the examination(s) was administered, the testing agency, school or college administering such examination, and whether or not you passed or successfully completed the examination without an accommodation: SAT (High School - 2002)  
and MCAT (2006-2007, College @ NYU) completed without  
accommodations

(e) Have you ever been denied any requested accommodation? Yes ☐ No ☒

If so, state the date of each such denial, identify the school(s), testing agency/agencies or other entity denying the requested accommodation, and describe in detail the circumstances: \_\_\_\_\_

5. Supporting Documentation. Attach all required supporting documentation. See REQUIRED SUPPORTING DOCUMENTATION in the accompanying instructions, the NBOME Policies & Procedures of ADA Accommodation, and Bulletin of Information.

#### VERIFICATION, AGREEMENT AND AUTHORIZATION

I, the undersigned candidate requesting an accommodation under the ADA,

CERTIFY, under the penalties for perjury, that all the foregoing representations and accompanying documentation are true and complete, and that the accommodation(s) requested by me is/are appropriate and necessary for me to have access to the COMLEX-USA Examination, and

AUTHORIZE any person, school, testing agency or other entity to release and provide to the NBOME or its representative upon the NBOME's request any and all information available relating to my Impairment or the information provided in my request for accommodation, including but not limited to any and all medical, tests, examinations or other records or documents pertaining to me.

Signature: \_\_\_\_\_

Candidate Name

Printed: \_\_\_\_\_

Candidate Name

Date: \_\_\_\_\_

National Board of Osteopathic Medical Examiners, 8765 W. Higgins Road, Suite 200, Chicago, IL 60631-4174

## COMLEX-USA LEVEL 1, LEVEL 2-CE, OR LEVEL 3 EXAMINATION

## OSTEOPATHIC MEDICAL SCHOOL QUESTIONNAIRE

This questionnaire must be completed and signed by or for the Dean of the osteopathic medical school/college where the Candidate studied osteopathic medicine, and submitted to the NBOME by the Candidate with his or her Request for Test Accommodation.

I, Felicia Bruno, as or for the Dean of Assistant Student Services/Human Affairs, verify that the records of this school/college show that Alicy Bahl (Candidate"),

A. Has the following physical or mental impairment for which an accommodation has been provided: None

B. Has been provided the following accommodation(s) by the school/college: None  
for or in connection with the following testing or activities: \_\_\_\_\_

Documentation Supporting Accommodation

Was the accommodation provided by the school/college based upon a professional diagnosis or documentation provided to the school/college by or for the Candidate? Yes ☐ No ☐.

If so, please describe all diagnostic information and other documentation reviewed and considered by the school/college upon which it based its approval of the accommodation to the Candidate: \_\_\_\_\_

Signed: [Signature] Date: 5/3/13  
Title: Asst. Dean Student Services/Human Affairs

\*\*\*\*PLEASE TYPE OR PRINT BELOW\*\*\*\*

Name of Dean: \_\_\_\_\_ Representative: \_\_\_\_\_

Business Address: \_\_\_\_\_ Business Phone \_\_\_\_\_  
Business Fax \_\_\_\_\_

National Board of Osteopathic Medical Examiners, 8765 W. Higgins Road, Suite 200, Chicago, IL 60631-4174



## Exhibit 6



## THE YELLIN CENTER

FOR MIND, BRAIN, AND EDUCATION

### **Comprehensive Neurodevelopmental Assessment**

**Ajay Bahl**

Date of Birth: 1/21/1985

Date of Assessment: 8/29/2011

Age at Assessment: 26 years

### **CLINICAL TEAM**

**Paul B. Yellin, M.D., F.A.A.P.**

**Beth Guadagni, M.A.**

### **REPORT FORMAT OVERVIEW**

To assist the reader, this report is divided into discrete sections. The section entitled "Learning Profile" highlights Ajay's assets and difficulties. The "Linking Profile to Academics" section includes a discussion of the linkages between Ajay's profile and his school performance. Ajay's unique "Learning Plan" contains recommended strategies for his specific profile. Finally, the "Neurodevelopmental Data" section provides the supporting evidence used by the clinicians to develop Ajay's profile of strengths and challenges. Some of this evidence is in the form of interpretive statements that specifically describe his approach to both neurodevelopmental and academic tasks. Additional evidence is presented in the form of subtest scores. These standardized scores compare Ajay's performance to that of a sample of same-age peers; such scores are merely one type of information that should be considered along with the other findings contained in this report. A summary of Ajay's medical, social, and emotional information is also included, as this is important neurodevelopmental data within our interdisciplinary model of assessment.

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The report is designed to be shared in its entirety; however, specific individuals working with Ajay may find certain sections more applicable to their situations. In addition, italicized terms appear in the attached glossary along with their definitions.

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**REFERRAL CONCERNS**

Ajay is a 26 year old student with long-standing attention deficit, anxiety, and speech problems, who is completing his third year at the New York College of Osteopathic Medicine (NYCOM). He was referred to the Yellin Center by Dr. Lenard Adler, his psychiatrist, for assessment and treatment of ongoing academic difficulties.

**BACKGROUND INFORMATION**

Ajay's history was somewhat challenging to obtain because he often spoke rapidly and generally provided non-specific answers to questions about his academic performance. He noted that he has had long-standing ADHD, anxiety, and speech difficulties ("cluttering"). However, when asked about his academic performance, he stated that he "never really excelled" because he has "problems with systems." With further querying, it appeared that he meant that he does not have a systematic approach to working or studying. At some point during the initial interview he did volunteer that his referral was at least in part precipitated by his recent failure of Step 1 of the USMLE.

Ajay was born on the south shore of Long Island and lived in Elmont, NY before moving to the Herricks School District. His mother is a cardiothoracic nurse practitioner at Mount Sinai Medical Center and his father is "involved in information technology at HHC." He has an older brother who has had academic difficulties and "falled out of Stony Brook", but now owns his own business. His sister is a first year psychiatry resident at Temple.

Ajay initially attended the Elmont Public Schools before his family moved and he attended Herricks High School. Ajay's academic history was hard to follow, but it seemed that he did receive good grades but that he had to work long hours. He attributed his long hours to "inefficiency due to the ADHD and anxiety." He stated that he "liked math and science" but did not do well in foreign language, which he attributed to his feeling that it was "pointless and involved pure memorization."

He attended NYU where he majored in psychology. After graduating, he entered the NYCOM. While he did reveal his recent Step 1 failure, he seemed reluctant to share any other specifics about his academic difficulties beyond the fact that he notices that his classmates seem to approach their work systematically while he feels that he has no strategies or systems.

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**Introduction.** The major features of Ajay's profile will be described in this "Learning Profile" section. His strengths and challenges will be discussed, including how they relate to his academic performance.

On August 25, 2011, Ajay met with Dr. Yellin to review Ajay's medical and academic history. He then returned on August 30 and worked with Ms. Guadagni and Dr. Yellin on a series of academic and neurodevelopmental tasks, including subtests of standardized neuropsychological batteries and additional tasks designed specifically to isolate and assess Ajay's neurodevelopmental functions and their relationships to learning and academic output. The following cognitive profile is the synthesis of the data, including quantitative and qualitative findings. It is presented briefly below, and then described in more detail, including a discussion of the linkages between Ajay's learning profile and specific aspects of his academic work.

**Strengths.** Ajay's neurodevelopmental profile includes the following assets:

- ***higher order cognition*** (complex and sophisticated thinking)
- ***short-term memory*** (briefly remembering new information)
- ***active working memory*** (mentally suspending information while using or manipulating it)
- ***long-term memory storage*** (placing information in memory)
- ***spatial ordering*** (interpreting and creating material that is visual or spatial)
- ***semantic understanding*** (knowing the meanings of words- though not necessarily using or defining them)
- ***sentence comprehension*** (understanding sentences and sentence structures) and ***sentence formulation*** (expressing thoughts in complete, grammatically correct sentences)
- ***mental work stamina*** (the flow of energy needed for cognitive work output, such as doing homework)

**Challenges.** The following weaker functions contribute to Ajay's academic difficulties:

- ***long-term memory access*** (retrieval of information from long-term memory)
- ***specific aspects of language:***
  - ***word retrieval*** (finding the right words quickly and easily)
  - ***discourse processing*** (interpreting language that is longer than a sentence, such as paragraphs, chapters, or stories)
- ***regulation of processing depth*** (managing intensity of focus to appreciate individual details, overarching themes, and part-to-whole relationships)

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In addition, across neurodevelopmental areas and academic skills, Ajay exhibits *slow rate* regarding both processing of information and production of work and limited *strategy use* (approaching tasks systematically).

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**Overview.** Ajay is particularly insightful in acknowledging that he lacks a systematic approach to his academic work. The volume and complexity of the material that one must master in medical school is not manageable in the absence of a strategic approach when deciding what to learn and how to learn it. Ajay's need for strategies is particularly pressing in the context of his long-standing attention deficit and anxiety, as well as the other areas of weakness in his learning profile. Despite these challenges, it is clear that Ajay is a bright, determined young man with a number of critical areas of strength that he can apply to overcoming his difficulties.

However, Ajay's challenges are contributing to a clinically significant reading disability which is evident on standardized assessments with the Nelson-Denny Reading Test (reading rate at the 14<sup>th</sup> percentile) and the Woodcock-Johnson III Tests of Achievement (reading fluency at the 15<sup>th</sup> percentile). In addition, when assessed informally, Ajay read approximately 99 words/ minute, which is in the average range for second grade. Due to his slow reading in addition to his generally slow rate of processing and production, reading, studying, and writing are extremely time consuming for Ajay. Therefore, reasonable accommodations for Ajay's disability will need to include 2x extended time for all examinations.

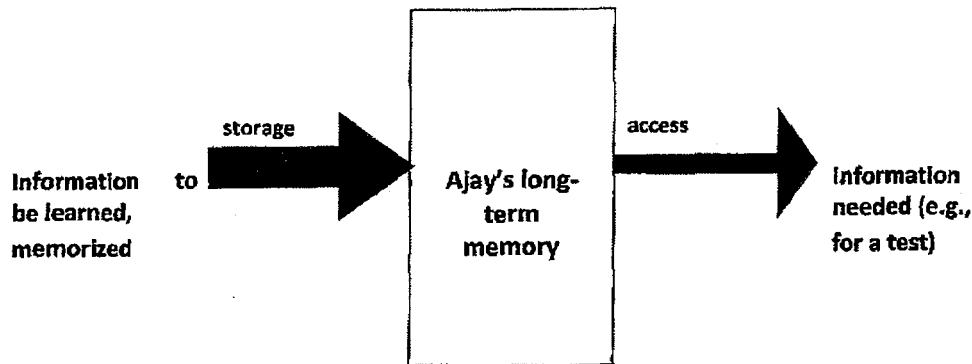
**Linking Profile to Academic Success.** Despite his struggles, it is clear that Ajay possesses a number of significant neurodevelopmental strengths that can help him successfully navigate through his medical school curriculum. For example, his strong performance on the Similarities subtest of the WAIS-IV (i.e., 91<sup>st</sup> percentile) was indicative of his excellent grasp of *verbal concepts*. Specifically, when presented with word pairs (e.g., friend and enemy), he did an excellent job looking beyond superficial differences to appreciate and describe those underlying critical features, ideas, and relationships that they shared (e.g., 'friend' and 'enemy' are similar in that they both describe 'people for whom you have strong feelings.'). The ability to work with concepts is a critical part of *higher order cognition* that will be particularly important for Ajay as he moves forward in medicine. A concept is a set of related critical features that creates a category or idea. Because Ajay is able to understand concepts, his memory is spared since he does not need to learn numerous examples.

Ajay also demonstrated his ability to apply solid *reasoning and logical thinking* as well as *problem solving* to clinical situations in the patient write-ups that he provided for our review. Finally, he displayed solid *pattern recognition* in his performance on a challenging Matrix task which began with a series of pictorial and geometric analogies but then involved increasingly abstract and complex geometric patterns. Specifically, he was shown 3 x 3 grids consisting of 8 complex geometric figures and asked to select, from a multiple-choice format, the figure that should be placed in the 9<sup>th</sup> spot. He was able to discern even the most complex patterns and select the correct answer. However, he worked at an extremely slow pace, and at times seemed to agonize over the specific feature that was most relevant to the underlying patterns. Ajay's higher order cognition is apparent in his capacity for reasoning, using logic, solving problems

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(not just in math), grasping rules, thinking critically, and forming concepts. Higher thinking is essential for understanding material, rather than simply memorizing information. Probably more than any other aspect of his profile, Ajay's higher order cognition bodes well for success in medical school and beyond.

While Ajay's limited use of strategies and weak *attention* lead to inconsistent performance on *memory* tasks, his underlying memory systems appear to be sufficient for meeting the great information storage demands of medical school. For example, his *long-term memory*, like the hard-drive of a computer, enables him to permanently store information, link it to his previous knowledge, and to access and use it when needed in the future. However, long-term memory includes two complementary functions: information storage and information access. Ajay seems to be able to store information, but he has a hard time accessing it. As the diagram below illustrates, he puts a lot more into his memory than he can retrieve.



Because he can store information, Ajay is able to recognize it, even if he has trouble recalling it. As we will discuss in the next section, this memory pattern is typically reflective of ineffective memory strategies. In other words, as Ajay becomes more strategic in his approach to his studies, it is likely that he will enhance his ability to access the information that he has stored.

When considering how our minds organize information that we process or produce, it is useful to think in terms of two ordering systems: *temporal-sequential ordering* and *spatial ordering*. The temporal-sequential ordering system, or sequencing, is important for managing information that is linear, consists of discrete data elements, and is organized in a specific order (e.g., physiological processes, steps in a procedure, or events in a history of present illness). In contrast, spatial ordering allows one to appreciate visual information and structures (e.g., an anatomic structure, radiologic images, or a gram stain). It is not unusual for people to demonstrate a predilection for one of these ordering systems. For example, Ajay appears to do best when information has a strong visual component or is highly contextualized, reflecting his solid spatial ordering. Hence, it will be important for him to use visual aids when studying and to link information to specific patients or clinical experiences.

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Ajay's excellent vocabulary and his solid *sentence comprehension* and *sentence formulation* are critical foundational aspects of *language* that he can leverage to help him manage his long-standing language difficulties. His language abilities, together with his solid interpersonal skills, will be important in helping in relate with patients, families, peers, supervisors, and other staff members. Finally, his impressive *mental work stamina* and his high level of motivation are noteworthy, already helping him overcome his challenges to reach this point in his career.

**Linking Profile to Academic Concerns.** In short, Ajay is a bright, determined, and hard-working young man whose neurodevelopmental profile includes many areas of strength that can help him overcome his struggles and experience success in his studies and beyond. However, moving forward, it will be important for him to implement specific strategies to address his challenges while maximizing his strengths. At this time, Ajay's struggles most relate to the following weaker parts of his learning profile: *long-term memory access*, specific parts of language (i.e., *word retrieval* and *discourse* levels of language), and regulation of *processing depth*. In addition, across neurodevelopmental functions, his performance is affected by challenges with *part-to-whole processing*, *slow rate of processing and production*, and limited *strategy use*. In this section, we will highlight some of the major implications of these challenges.

***What are the implications of Ajay's weak long-term memory access?*** Ajay's weak long-term memory access or retrieval is a significant factor in his academic difficulties. A memory retrieval problem is analogous to having a well-stocked library but an inefficient system for finding the necessary books at the right time. Even if Ajay has stored the information he needs, he frequently has trouble retrieving it, particularly if the questions are open-ended.

It is likely that Ajay's long-term access problems reflect his limited repertoire of memory strategies. Because of difficulty with memory strategies, studying is problematic for Ajay; when he does not store information systematically, he has a hard time retrieving it later when taking tests or quizzes. Specifically, he has difficulty categorizing incoming information and filing it in his mind "next to" other related topics. This inefficient filing system causes him to have problems retrieving information quickly and efficiently on rounds or during examinations. There are many ways to absorb information, and the most effective ways involve transforming the material rather than passively trying to memorize by rote. Ajay needs to expand his toolbox of techniques for transforming and storing information.

***How does Ajay's struggle with regulation of processing depth affect his performance?*** Attention can be viewed as a set of mental abilities, grouped into three control systems. The first is the *mental energy control system*, which maintains alertness and "fuel" for thinking and cognitive effort. The second is the *processing control system*, which handles input (e.g., information heard or seen). The third is the *production control system*, which regulates behavior and academic output, such as math homework or an essay.

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At this time, Ajay is struggling most with his processing controls, particularly his regulation of processing depth. Processing depth refers to the intensity of focus and is akin to a camera's lens. At times, one must focus intently on specific details, as with a telephoto lens. At other times, we need to pull back, as with a wide angle lens, to appreciate the "big picture" (i.e., main ideas and overarching themes). In fact, we are constantly readjusting our processing depth between individual details and overarching themes so we can understand how all of the details relate to each other and to the big picture (i.e., part-to-whole processing). The figure below illustrates the impact of varying processing depth.

	levels	features/signs
When Ajay focuses too deeply >	over-focused on details	<ul style="list-style-type: none"> <li>• spending a lot of time focused on one problem</li> <li>• redoing and second-guessing answers</li> <li>• taking much longer than anticipated to finish assignments/tasks</li> </ul>
	optimal level of focus	<ul style="list-style-type: none"> <li>• focusing with sufficient intensity to take in important details</li> <li>• balancing the "big picture" and the smaller details</li> <li>• completing assignments/tasks in the appropriate amount of time</li> </ul>
When Ajay focuses too superficially >	under-focused on details	<ul style="list-style-type: none"> <li>• reaching the bottom of a page and not remembering what you just read</li> <li>• getting the gist of something but not remembering the details</li> <li>• finishing an assignment much faster than anticipated</li> </ul>

Ajay has trouble gauging how much he should attend to details. At times he over-attends and gets bogged down in the fine points. This can lead to difficulty stepping back and perceiving the big picture. Put another way, Ajay concentrates so much on the trees that he struggles to see the forest. Processing too deeply can also result in a slow work rate for Ajay, as he spends excessive time wrangling over details. Transitions can also be problematic because he is so centered on small elements that he struggles to disengage and move on to another topic or task.

However, at other times, he does not focus deeply enough. At those times, because of his shallow processing depth, Ajay frequently glosses over material and misses details, affecting his understanding and accuracy in areas such as *reading comprehension* and *math reasoning*. Shallow processing depth is particularly problematic for Ajay when he is listening (vs. reading). When listening, he usually only gets one pass at the information and he cannot control the



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speed with which it comes. In contrast, if he needs to, he can read more slowly or reread things, allowing information to sink in more deeply.

Ajay's difficulty distinguishing important information from less important information (saliency determination) also leads to being distractible. In other words, his focus can be attracted more to other sights and sounds than to the material or task at hand. A critical aspect of studying is deciding what information is important and most likely to be asked about on the test, which is also difficult for Ajay because of his weak saliency determination. Weak saliency determination can make distinguishing among possible choices on multiple-choice questions challenging, particularly when there are subtle differences among the choices. Finally, we rely on saliency determination when setting priorities for allocating time and for organizing materials and discarding extraneous materials to avoid clutter.

***Why is reading difficult for Ajay?*** Due to weak word retrieval, Ajay's decoding is choppy and somewhat dysfluent, affecting both his rate and comprehension. Because Ajay struggles with saliency determination, it is difficult for him to identify main ideas or relevant information. Ajay's superficial processing depth makes it difficult for him to read with sufficient concentration or understanding because he glosses over key points and important details. He has trouble using his long-term memory access to link any prior knowledge or experiences to what he is currently reading. Connecting previous knowledge to the text bolsters understanding and helps with retention of new information. His slow processing rate diminishes his understanding of reading passages; he reads so slowly that he often forgets what he read earlier in the text. As a result, Ajay has trouble understanding lengthy passages, when reading or listening (i.e., *weak discourse processing*). Put differently, he has a hard time grasping how multiple sentences relate to each other to convey meaning (e.g., a story, information, or an argument). Ajay's reading comprehension improves when he confronts a reduced chunk size of text.

**Rate.** Ajay has a hard time getting things accomplished because of a generally slow rate of processing and production. Put another way, he requires a bit more time to complete most tasks. It is important to note that his production rate is an aspect of his neurodevelopmental profile, meaning that he does not work slowly out of laziness. While his production rate needs to be understood and accommodated, there are strategies for increasing his work speed that will be included in his learning plan.

**Strategy Use.** Ajay has trouble coming up with the best strategies for figuring out solutions to problems and completing tasks. He tends to approach things passively and unsystematically. For instance, he might rely on rote memory rather than utilize a study plan, or compose a single draft instead of staging his writing process, or try to compute in his head as opposed to using diagrams to solve math problems. His limited strategy use contributes to his disorganization which further undermines his productivity. Efficient work requires a degree of organization in terms of handling materials, keeping to a schedule, and structuring one's thinking. If he were

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more organized in these areas, Ajay could better use his assets to generate quality output. Ajay will need to develop his capacity to generate his own strategies (e.g., to memorize for an exam) as well as to learn more proven strategies. Determining the appropriate strategy for a task needs to be one of the first things Ajay does when he is working.

**Anxiety.** Learning and academic performance are affected by emotional state, while academic performance also affects anxiety. For example, significant worrying can decrease mental energy and disrupt any of the neurodevelopmental constructs. Also, learning problems frequently lead to uneasiness about school, which in turn contributes to worrying. Therefore, it will be important to address both Ajay's learning and emotional issues in his learning plan.

**Conclusions.** Ajay's learning profile includes many neurodevelopmental strengths that represent good potential for success in medical school. However, his ability to harness these areas of strength is undermined by the weaker parts of his learning profile. Ajay's constellation of challenges is consistent with the following diagnoses:

- Attention Deficit Disorder, Inattentive (ICD-9-CM-314.00)
- Frontal lobe and executive function disorder (ICD-9-CM-799.55)
- Mixed Receptive and Expressive Language Disorder (ICD-9-CM-315.32)
- Anxiety, Unspecified (ICD-9-CM-300.00)

However, in our view, it will be more important for Ajay and those working with him to understand his needs in the context of a more nuanced view of his specific profile of strengths and challenges. With such understanding and the associated implementation of an effective combination of interventions, bypass strategies, and accommodations, it is likely that Ajay will make steady gains in his learning and refine his skills and abilities. We look forward to reviewing our findings, impressions, and recommendations with Ajay.

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**LEARNING PLAN**

**Introduction.** Ajay, based upon your learning profile, we have included a variety of interventions and accommodations, which can be implemented across a variety of settings. We realize that some of these may already be in place while others may have been tried in the past unsuccessfully. Some of the recommendations may not suit a particular setting or fit with a specific combination of personalities with whom you may be working. We recognize that you have insights that we could not possibly have as to the types of strategies that may be successful. Therefore, we offer a number of suggestions so that you can choose the most suitable ones for your situation. During the report consultation, we can assist you in prioritizing strategies and planning for their implementation.

**1. Ajay, demystification is the process of taking the mystery out of learning.** It should be ongoing and you may want to use this report as a starting point. It is important for you to be able to verbalize your understanding of how your mind works and use appropriate vocabulary to describe your strengths and weaknesses. You might benefit from paying close attention to times when you will need to be using specific functions in everyday activities such as recalling a phone number (sequential memory), organizing materials for cooking, work, or a hobby project (spatial or sequential ordering), or giving someone instructions on how to find your house (expressive language). It is also important to understand the rationale behind the strategies you choose to use, and how they connect to your particular strengths and weaknesses. It is important that you understand that everyone has weaker and stronger parts of their minds. Even those people who seem to do everything with ease have some areas in which they have to work hard to achieve. You need to know that your issues are not pervasive and that there are bright possibilities in your future.

**Strategies to Improve Reading Comprehension**

**\*1. You should explicitly choose reading strategies to use while reading.** Having a specific strategy in mind will help focus your thoughts and keep you actively engaged in the text. A handout, *Reading Strategy Sentence Starters*, is included with this report.

**2. It might benefit you to have a list of questions about your reading material available before you read to draw your focus to the most critical information.** If you don't have access to study questions or a study guide, you can try making your own questions. Flip through reading material before you begin to read and consider what you already know about the topic and what information would be important to absorb, then compose some of your own questions or collaborate with a peer to formulate a list.

**3. You may find it beneficial to work with a speed-reading program in order to help improve your reading rate.** Following are two recommended programs:

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- Davidson Ultimate Speed Reader ([www.humanexcellence.com/products/ultimate-speed-reader](http://www.humanexcellence.com/products/ultimate-speed-reader)) offers six activities to increase peripheral vision, improve eye movement, and increase overall reading speed.
- Eye Q by Infinite Minds ([www.eyegadvantage.com](http://www.eyegadvantage.com)) is a "brain enhancement" program that uses reading speed to measure its effectiveness and give immediate feedback to the user. Eye Q increases reading speed, which is why it is often called a speed-reading program.

**4. You need to solidify your oral fluency much like an athlete or musician practices and 'over-learns' basic skills.** You should engage in fluency training sessions (i.e., repeated practice), with a tutor or mentor feedback/guidance, for five to six minutes a day over an extended period of time. The goal of these sessions is for you to ingrain words so deeply that you can read them aloud without conscious thought. For example, you should begin with a simple passage that you can read relatively easily and quickly. Practice reading the same passage at least four times per sitting. Measure your fluency rate and graph the results.

#### **Strategies for Testing**

**\*1. To help you determine what is important to study, make up sample tests and write questions that you predict will be on the actual test.** You could also take the test for practice, ideally a day or two after constructing the test.

**\*2. Take practice tests.** This will familiarize you with the format of the exam and the strategies needed for that format. At first, take these practice tests in an untimed manner. After you feel comfortable with your strategies, begin to take them under time constraints. It is important to practice taking the exams with the added pressure of time, which can lead to anxiety within testing situations.

**3. When taking multiple-choice tests, you may often become stuck, over-focusing on information about which you are unsure.** You would benefit from first reviewing the question prior to reading the vignette. Another option is to first read the vignette to gain an overall gist, then reread for details. This will help your mind to focus on the salient details, rather than become distracted by extraneous information.

**4. When taking a test, you should first jot down memory aids, formulas, or important facts in the margins before you begin work.**

**\*5. Stepwise approaches could really help you tackle extended tasks, like studying for a major exam:**

- You should break down complex and multi-step tasks into long-term goals (e.g., "When is my project due and what will it look like when it's finished?") and short-term

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objectives (e.g., "What part of my project needs to be done tonight?"). Plans for tasks that occur frequently (e.g., regular monthly assignments) can be compiled into a notebook and kept for easy reference during future work assignments.

- Checklists also provide built-in reinforcement as it can be very satisfying to check off goals and objectives as they are completed. You may need some coaching in how to create and use checklists, but as you gain experience it should become your responsibility to use them independently. Those working with you can then review the checklists and help you develop a good plan to facilitate homework completion.

### **Strategies to Improve Long-Term Memory Retrieval**

**1. Studying and memorizing can be much more efficient and effective when information is learned in multiple ways.** You may find studying more engaging and the material more interesting when you use different forms of mental representation. For example, a concept can be learned by thinking of a good example of it, relating it to personal experience, and by constructing some sort of diagram depicting it. The enclosed handout, *Forms of Mental Representation*, contains a list of different possible ways to learn information. Using all of the listed forms is not the goal. Rather, you should try three or four per concept or piece of information. Over time and with practice, you will become more comfortable with some that work particularly well for you. You may even come up with other forms of mental representation that are not on this list.

**2. When studying and taking notes, you will benefit from using a method that allows you to process the information before, during, and after a lecture:**

- Before the lecture, make sure to read the text using active reading strategies.
- During the lecture, take detailed notes and be sure to write down important information. It may be helpful to tape record the lecture in order to ensure that your notes are complete.
- After the lecture, reread your notes, fill in any missing information, and write a one or two sentence summary at the end of each page. This will be a useful review of your notes as you prepare for a test.

See the enclosed handouts, *Cornell Note Taking Method* and *Cornell Note Taking Template*.

**3. To leverage your spatial ordering, you should use graphic organizers for note-taking as you read and study.** A handout, *Graphic Organizers*, is included that contains several templates for graphic organizers. You may find it more helpful to generate your own templates.

You may want to consider a software program that will help you organize information. Look at programs that produce both graphic diagrams (such as concept maps and flowcharts) and



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sequential outlines. For example, Inspiration software ([inspiration.com](http://inspiration.com)), converts outlines to maps and/or diagrams and vice-versa, and allows the user to shift back and forth. Austhink ([austhink.com](http://austhink.com)) provides a visual framework to organize information and structure arguments. Mindjet MindManager ([www.mindjet.com](http://www.mindjet.com)) is yet another tool for helping one organize ideas and projects using a visual format.

**\*4. When studying, you would benefit from interleaving the practice of different skills, or studying across multiple topics.** By studying a mix of questions that focus on a variety of topics, you can truly study and assess your knowledge of these content areas. You should create a study plan where no two problems of the same kind appear consecutively. Please refer to the article, by Kelli Taylor, A. and Rohrer, D. (2010). The Effects of Interleaved Practice. *Applied Cognitive Psychology*, 24, 837-848.

**\*5. You should find opportunities to be an active processor of information.** Some strategies that would help to improve your depth of processing are repeating something you just heard to yourself in a whisper, summarizing orally what you read, drawing a semantic map of what you heard, etc. Another helpful strategy would be to form pictures in your mind when you are learning new information. For example, you could make a movie in your mind, and picture yourself actually implementing the information you are hearing in lecture. The following are some examples of how to implement this strategy:

- Create a clear diagram of the anatomical structures involved in the topic being studied.
- Develop a flowchart of processes involved, time, course of symptoms, etc.
- Develop a clinical vignette that illustrates the principles.

**6. Students like you, with difficulty regulating processing depth, must be encouraged to interrelate what they have learned.** Compare and contrast ideas, facts, and procedures. For example, it would be helpful to compare and contrast a topic that you are currently learning about (such as the long-term outcome of unstable angina) with events you have learned about previously (such as long-term outcome of type 2 DM).

#### **Strategy to Improve Your Accuracy**

**1. Small errors often compromise the accuracy of your work.** Although you have a clear understanding of concepts and procedures, your difficulty with processing depth can cause you to make "careless mistakes." You can best reduce the number of these errors by being aware of the types of mistakes you tend to make and becoming accustomed to scanning for them. It might be helpful for you to track the types of errors you make to determine where your pitfalls lie. You can then make a checklist to remind you of what to look for when you check your work. Gaining an understanding of the types of details you tend to miss will help you check your work more effectively and efficiently.

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**\*Highest Priority Strategies**

**Academic Adjustments and Accommodations**

In our view, your struggles do constitute a disability significant enough to qualify for accommodations under the Americans with Disabilities Act (ADA). Specifically, we believe that you should be provided the following accommodations:

1. Due to Ajay's slow rate of processing and production, his expressive language disorder, and his extremely low reading fluency, he will require the maximum extended time for all examinations, but not less than 2x the standard time.
2. Due to his word retrieval struggles, Ajay should be given advanced warning before being called on in rounds. The purpose of this warning is to provide him a few moments to organize his thoughts and words, and therefore need not be more than five or ten minutes.

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**Ajay Bahl****8/29/2011****SUMMARY OF FINDINGS**

**Neurodevelopmental Strengths.** Ajay's neurodevelopmental assessment incorporated a comprehensive array of tools that were used both quantitatively and qualitatively. Findings were integrated with information from Ajay to uncover his profile. This section includes examples of the evidence used to identify his assets. These examples represent only a portion of the information compiled during the assessment, but are representative of the findings. In some instances, standardized measures were used that generated normed scores that are included at the end of this report. Such scores should be interpreted in conjunction with all of the information about Ajay, including qualitative findings.

**higher order cognition**

- skillfully explained how word pairs were related conceptually (e.g., enemy and friend are similar in that they both describe people for whom you have strong feelings)
- determined how pairs of pictures were related and then applied the relationships to other picture pairs (this task did not involve language)
- displayed solid analysis and synthesis in his patient H & P write ups
- when asked to identify a target object from a set of objects through yes/no questions (akin to the "Twenty Questions" game), he was able to formulate series of questions that allowed him to identify objects with relatively few questions

**short-term memory**

- remembered an appropriate number of list words after a short delay
- accurately repeated lengthy sentences

**active working memory**

- remembered an age-appropriate number of list words while simultaneously sorting them (e.g., animals vs. non-animals) and ordering them (e.g., smallest to largest)
- able to reverse number series
- successfully performed complex counting activities, such as alternating between letters and numbers

**long-term memory storage**

- after a long delay, recalled few list words, but his performance improved when he was given recognition cues, suggesting that he stored the list words in his long-term memory but had difficulty retrieving them without prompts
- after a long delay, had great difficulty drawing a complex figure from memory, but recognized several elements of a design among an array of other shapes, suggesting that he stored the visual information in his long-term memory

**spatial ordering**

- his copy of a complex figure was a solid match with the original design

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- could identify individual components of a complex figure
- did a solid job on a task involving complex geometric patterns
- when given sufficient time, able to assemble red/white blocks to replicate increasingly complex patterns

semantic understanding

- was terrific at explaining how two words are somehow related

sentence comprehension and formulation

- constructed excellent sentences from word prompts
- was terrific at drawing inferences when presented with language that was missing information

Neurodevelopmental Challenges. This section includes some of the qualitative and quantitative evidence used to identify the weaker aspects of Ajay's neurodevelopmental profile. As was the case with his assets (see above) these examples are a sampling of the information considered in the assessment. Some normed scores were interpreted in conjunction with the qualitative findings and are included at the end of this report.

long-term memory access

- did not recall much of a word list after an extended delay
- struggled to learn words coupled with symbols, even though he was taught the pairs several times
- drew little of a design from memory after a long delay

parts of language

- had trouble listing as many members of a category (e.g., animals) as he could in a brief amount of time (word retrieval)
- had trouble with comprehension questions about a narrative passage (i.e., conveying a plot) (discourse processing)
- struggled when asked comprehension questions for an expository passage (such as might be found in a chapter of a science textbook) (discourse processing)

processing depth

- makes random errors in his academic work
- made math errors due to misreading function signs or missing key details in the problems
- missed several small details in pictures or drawings
- missed details in story

rate of processing/production

- worked at an exceptionally slow pace

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- reading fluency was at the 14<sup>th</sup> percentile for his age
- had trouble completing timed tasks within time limits

**Academic.** The educational portion of the evaluation was primarily a dynamic assessment consisting of a series of tasks selected specifically for Ajay based on background information. During the assessment, the learning specialist observed closely for academic strengths, patterns of errors, breakdown points, and other observable phenomena that could be linked to Ajay's neurodevelopmental functioning. Ajay was also interviewed about approaches to tasks, and various teaching strategies were implemented to determine what interventions may be the most helpful to incorporate in his learning plan. In addition to these dynamic procedures, selected standardized tasks were utilized and some normative scores were generated.

The information below summarizes the key findings of the academic assessment for reading (decoding and comprehension), spelling, written expression, and math (operations and reasoning).

#### reading decoding

- decoded age-level words in isolation with good accuracy, hesitating only once (before reading nucleic)
- experienced slightly more difficulty when reading age-level nonsense words; errors consisted of omissions (e.g. "frazlition" for frazlition) (demonstrates intact phonics knowledge)
- was somewhat choppy but accurate when reading age-level sentences in isolation
- in general, mispronounced uncommon words encountered in reading (e.g. "CHO-fer" for chauffer, "debutantays" for debutantes)
- read a paragraph of an age-level expository text aloud with perfect accuracy and good fluency and prosody
- reading rate was considerably slower than average on both an informal measure of reading speed (99 WPM) and an standardized measure (Nelson-Denny: 14<sup>th</sup> percentile)

#### reading comprehension

- was generally accurate when retelling isolated sentences, though demonstrated some confusion about word meaning (e.g. substituted "trade" for avid) (indicates good sentence comprehension)
- experienced some difficulty defining vocabulary words across various tasks
- had difficulty answering some concept questions prior to reading passage which required him to define words and recall specific events in history (indicative of poor long-term memory recall)
- when asked to highlight main ideas in a paragraph from passage, selected relevant, appropriate sentences (demonstrates good saliency determination)



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- provided a non-sequential summary from memory after reading expository passage, which contained both main ideas and details; of note, retelling was choppy, with a great deal of hesitation between phrases (reveals weak discourse processing/production)
- had difficulty stating main idea of passage concisely, listing information from passage instead of providing a concise answer
- was able to answer most implicit questions correctly, but experienced difficulty recalling answers to explicit questions that required him to recall specific details (suggests difficulty regulating processing depth)
- successfully used the opportunity for a look-back to correct an inaccurate answer
- of note, answers were generally wordy and focused on small details rather than unifying trends; word use was often imprecise (e.g. "reception" instead of interception, "avoided them having to" instead of prevented them from having to)
- on a standardized measure of reading comprehension, performed in the average range (Nelson-Denny: 35<sup>th</sup> percentile)

spelling

- demonstrated skills in the late "derivational relations" stage of spelling development, suggesting spelling within age-level range (demonstrates good phonics knowledge/orthographic memory)
- able to spell words containing syllable junctures and prefixes/suffixes (e.g. resident, puncture, adjourn)
- experienced some difficulty spelling words with reduced/alterd vowels and bases/roots (e.g. "comotion" for commotion; "camouflouged" for camouflage)
- comparable performance on spelling recognition task, which required him to select correct spelling of words; of note, tended to misidentify as correct words he spelled incorrectly
- in context, demonstrated some confusion between simple homophones ("your" for you're); was otherwise very accurate

written expression

- wrote three sentences from dictation with generally good mechanical accuracy (suggests good active working memory)
- demonstrated some knowledge of comma use, capitalization, quotation mark placement, and appropriate ending punctuation
- experienced some difficulty with apostrophe use, comma placement in dialogue, and capitalization of proper nouns
- prior to assessment, wrote part of an introductory paragraph for a persuasive essay in which he acknowledged both sides of the issue
- writing was wordy and somewhat difficult to follow
- word use and tone were academic and appropriate for task

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- writing samples submitted effectively followed a specific format (patient write-up) and contained well-constructed sentences featuring appropriate word use and generally good mechanical accuracy
- on a standardized writing task, well able to convey ideas in writing in response to a variety of demands (Writing Samples, scaled score = 118)
- was slow to write sentences, generally pausing many times to reconsider wording mid-sentence and making numerous corrections; reread work methodically before moving on (indicates slow rate of processing/production)

math operations

- able to solve simple addition, subtraction, and multiplication math facts with good automaticity (Math Fluency, scaled score = 105)
- recalled procedures for operations involving fractions, decimals, negative numbers, basic algebra, and order of operations
- correctly solved problems requiring him to plot points and graph a line
- used correct formula to find circumference of a circle, but produced an inaccurate answer due to procedural error
- was incorrect in calculating surface area of a rectangular prism due to failure to notice all of the measurements on presented graphic
- could not recall definition for standard notation and thus had some difficulty solving problem
- able to correct calculation errors quickly when they were pointed out to him; stated that he often makes these errors and sees them if he checks his work, though he doesn't always do so (indicative of shallow processing depth)
- occasionally skipped homework problems because his scratch work made them difficult to notice on the sheet

math reasoning

- preferred to use logic rather than step-by-step procedures (especially when working with percentages) to solve problems which led to some inaccuracies in his answers (suggests weak long-term memory recall)
- able to recognize and complete a complex number pattern, though employed a complicated, time-consuming strategy for finishing pattern
- counted money in a sequential way, though failed to notice all of the coins
- used correct operations to solve an elapsed time problem on paper, though answered incorrectly due to a calculation error (which he self-corrected later)
- developed and solved an algebraic equation based on a word problem
- solved a multi-step geometry problem by jotting down numbers as he calculated them and without drawing the figure to help him visualize it
- able to recognize congruent/non-congruent shapes (indicates good spatial processing)
- was slightly slower when solving word problems with extraneous information, but was able to identify relevant information and answer correctly

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**RELEVANT MEDICAL INFORMATION**

Ajay reports that with the exception of long-standing attention deficit disorder, anxiety, and speech problems (i.e., cluttering), he has been in generally good health with no other significant medical or surgical problems. His current medications include Vyvanse® (lisdexamfetamine dimesylate), Strattera® (atomoxetine), and Buspar® (buspirone).

Ajay appeared to be well developed, well nourished, and in good general health. Stereoscopic vision screening indicated that Ajay has good visual acuity in both eyes for distance and near vision. A pure tone hearing screening across the frequency range of 1000 to 4000 Hz. indicated that Ajay's threshold for hearing is normal. The remainder of his physical examination was deferred at this time.

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**RELEVANT INFORMATION ON EMOTIONS AND BEHAVIOR**

Ajay remains in treatment for attention deficit and anxiety. As part of our assessment, Ajay completed the Behavior Rating Inventory for Executive Function (BRIEF). His responses on the BRIEF were consistent with significant difficulties with shifting focus (T=72/99<sup>th</sup> percentile), working memory (T=77/99<sup>th</sup> percentile), planning/organization (T=74/>99<sup>th</sup> percentile), task monitoring (T=77/98<sup>th</sup> percentile), and increased risk of difficulties with inhibition (T=69/93<sup>rd</sup> percentile) and task initiation (T=65/93<sup>rd</sup> percentile).

**PREVIOUS ASSESSMENTS**

No results of previous assessments were available.

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**APPENDIX**

The following clinical tools were used in Ajay's assessment.

**Neurodevelopmental Assessment Procedures.**

Delis-Kaplan Executive Function System

Tower Test

Trail Making Test

Twenty Questions Test

Verbal Fluency Test

Kaufman Brief Intelligence Test- Second Edition

Nonverbal

Rey Complex Figure Test and Recognition Trial

Rey Copy Trial

Rey Delayed Recall Trial

Rey Immediate Recall Trial

Rey Recognition Trial

Wechsler Adult Intelligence Scale- Fourth Edition

Block Design

Digit Span

Similarities

Wide Range Assessment of Memory and Learning- Second Edition

Sentence Memory

Story Memory

Story Memory Delay Recall

Story Memory Recognition

Verbal Learning

Verbal Learning Delay Recall

Verbal Learning Recognition

Verbal Working Memory

Woodcock-Johnson III Tests of Cognitive Abilities

Visual-Auditory Learning

Visual-Auditory Learning-Delayed

**Educational Assessment Procedures.**

Qualitative Reading Inventory

Subject Word List

Reading Passage, High School level

*Words Their Way*, Third Edition

Upper Level Spelling Inventory

Homework Packet

Student interview (with Ajay)

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Surveyor of Academic Attainment  
Woodcock-Johnson III Tests of Achievement, Form B  
Math Fluency  
Reading Fluency  
Writing Samples

**Other Assessment Procedures.**

Behavior Rating Inventory for Executive Function-Adult-Self Report  
Student interview (with Ajay)

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**Ajay Bahl****8/29/2011****Subtest Scores**

Ajay's neurodevelopmental and academic assessments incorporated a comprehensive array of tools generating both quantitative and qualitative data. Findings were integrated with information from home and school to uncover his profile. The following normed scores represent only a small portion of the data considered in our assessment and must therefore be interpreted with caution.

Tasks Administered*	scaled score	standard score	T score	Percentile
<b>Delis-Kaplan Executive Function System</b>				
Trail Making Test				
Visual Scanning	12			75
Number Sequencing	7			16
Letter Sequencing	9			37
Number-Letter Switching	10			50
Motor Speed	12			75
Twenty Questions				
Initial Abstraction Score	11			63
Total Questions Asked	12			75
Total Weighted Achievement Score	13			84
<b>Tower Test</b>				
Total Achievement Score	11			63
<b>Verbal Fluency Test</b>				
Letter Fluency	9			37
Category Fluency	8			25
Category Fluency	9			37
Category Switching	10			50
<b>Kaufman Brief Intelligence Tests – 2<sup>nd</sup> Edition</b>				
Nonverbal		109		73
<b>Nelson-Denny Reading Test, Form H</b>				
Reading Rate				14
Comprehension				35
<b>Rey Complex Figure Test and Recognition Trial</b>				
Rey Copy Trial**				>16
Rey Immediate Trial			32	4
Rey Delayed Trial			<20	<1
Rey Recognition Trial			41	18
<b>Wechsler Adult Intelligence Scale – 4<sup>th</sup> Edition</b>				
Block Design	7			16
Block Design No Time Bonus	8			25
Similarities	14			91
Digit Span	7			16

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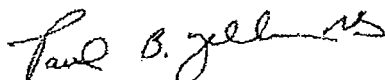
Digit Span Forward	8		25
Digit Span Backward	9		37
Digit Span Sequencing	6		9
<b>Wide Range Assessment of Memory and Learning- 2<sup>nd</sup> Edition</b>			
Story Memory	8		25
Story Memory Delay Recall	9		37
Story Memory Delay Recognition	4		2
Verbal Learning	9		37
Verbal Learning Delay	6		9
Verbal Learning Recognition	10		50
Sentence Memory	11		63
Verbal Working Memory	11		63
<b>Woodcock-Johnson III Tests of Achievement, Form A</b>			
Reading Fluency		84	15
Math Fluency		105	64
Writing Samples		118	89
<b>Woodcock-Johnson III Tests of Cognitive Abilities</b>			
Visual-Auditory Learning		80	9
Visual-Auditory Learning - Delayed		79	8

*\*This table only includes scores for subtests administered in the standard fashion and as such may not include all items listed in the Appendix.*

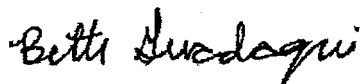
*\*\*These tests use Criterion Scores*

*Note- Normed/standard scores compare Ajay's performance on a task to the performance of same-age peers. A score that is close to the mean score represents performance that is typical for a student his age. Following are common standard scores, including means and average ranges.*

score type	mean	standard deviation	average range
subtest/scaled score	10	3	8 to 12
standard score	100	15	86 to 114
T score	50	10	41 to 59



**Paul B. Yellin, M.D., F.A.A.P.**



**Beth Guadagni, M.A.**

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### The Neurodevelopmental Framework of The Yellin Center

A person's neurodevelopmental functions can be divided into eight constructs (or systems). Each of these constructs contains related functions or components. Below is a listing of the eight constructs, along with the functions contained in each.

On the following pages is a glossary that includes definitions for these terms. Since every person has a different profile, not all of these terms will be discussed in this report.

<b>1. ATTENTION</b>	<b>4. TEMPORAL-SEQUENTIAL ORDERING</b>
Mental Energy Control System	Sequential Awareness/Perception
Alertness	Sequential Memory
Mental Effort	Sequential Output
Sleep-Arousal Balance	Time Management
Performance Consistency	Higher Sequential Thinking
<b>Processing Control System</b>	<b>5. SPATIAL ORDERING</b>
Saliency Determination	Spatial Awareness/Perception
Processing Depth (Depth of Processing)	Spatial Memory
Cognitive Activation	Spatial Output
Focal Maintenance	Material Management
Satisfaction Level	Higher Spatial Thinking
<b>Production Control System</b>	<b>6. NEUROMOTOR FUNCTION</b>
Previewing	Gross Motor Function
Facilitation and Inhibition	Fine Motor Function
Pacing	Graphomotor Function
Self-monitoring	<b>7. HIGHER ORDER COGNITION</b>
Reinforceability	Critical Thinking
<b>2. MEMORY</b>	Creativity and Brainstorming
Short-Term Memory	Problem Solving
Active Working Memory	Rule Use
Long-Term Memory Storage	Reasoning and Logical Thinking
Long-Term Memory Access	Mental Representation
<b>3. LANGUAGE</b>	Concept Formation
Receptive Language	Verbal Conceptualization
Phonological Processing	Nonverbal Conceptualization
Morphological Sense	Process Conceptualization
Semantic Understanding	<b>8. SOCIAL COGNITION</b>
Sentence Comprehension	Verbal Pragmatics
Discourse Processing	Social Behaviors
<b>Expressive Language</b>	
Articulation and Fluency	
Semantic Use	
Word Retrieval	
Sentence Formulation	
Discourse Production	
Verbal Elaboration	

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**Glossary of Neurodevelopmental and Educational Terms**

Below is a list of terms that you might find in the report (in *italics*). Since every student has a unique profile, not every term listed here will be discussed in a given report.

Active Working Memory	mentally suspending information while using or manipulating it
Alertness	an effective level of focused listening, watching, and concentrating
Articulation and Fluency	using mouth muscles effectively (also known as Oromotor Function), enunciating correctly and generating smooth, intelligible speech
Attention	a network of interactive controls over mental functioning, including mental energy, incoming information, and regulation of output
Automaticity	the capacity to perform tasks rapidly with little effort, such as decoding words and retrieving information from memory
Body Position Sense	keeping track of one's body while balancing or moving
Chunk Size	the amount of material a student takes in (e.g., reading or listening) or generates (e.g., writing)
Cognitive Activation	linking incoming information with prior knowledge and experience (see Cognitive Over-activation and Cognitive Under-activation)
Cognitive Over-activation	excessive processing, or forming connections that are not particularly relevant to the topic at hand
Cognitive Under-activation	passive processing, or not forming enough relevant associations with incoming information
Concept Formation	integrating a series of features that often go together to form a class of ideas or objects
Creativity and Brainstorming	thinking independently and producing self-generated thoughts or other products
Critical Thinking	evaluating products, ideas, and opinions
Depth of Processing	see Processing Depth
Discourse Processing	interpreting language beyond the boundaries of a sentence, such as paragraphs, chapters, or stories
Discourse Production	communicating information in a cohesive chain of sentences (e.g., paragraphs, essays)
Expressive Language	communicating and producing ideas orally and in writing
Facilitation and Inhibition	selecting the best option before acting or starting a task; weak facilitation and inhibition leads to impulsivity
Fine Motor Function	demonstrating effective manual dexterity (hands and fingers)
Fine Motor Problem Solving and Logic	responding to the challenges of fine motor activities with appropriate plans (e.g., fixing things, using tools)
Focal Maintenance	sustaining concentration for the appropriate period of time (also known as attention span or sustained attention)
Graphomotor Feedback	feeling where the writing utensil (e.g., pencil) is during letter formation

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Graphomotor Function	maneuvering a utensil to produce handwriting
Graphomotor Memory	recalling letter and number forms rapidly and accurately
Graphomotor Production	implementing the act of handwriting; coordinating the motor actions needed for each aspect of the handwriting task
Gross Motor Function	using the body's large muscles in a coordinated, effective manner
Gross Motor Problem Solving and Logic	responding to the challenges of gross motor activities with appropriate plans (e.g., dribbling a ball, swinging a bat, completing a dance step)
Gross Motor Production	mobilizing the right muscles in the best order to achieve a motor goal
Higher Order Cognition	set of related processes that guide complex and sophisticated thinking
Higher Sequential Thinking	using serial order to enhance concept development and problem solving
Higher Spatial Thinking	reasoning and conceptualizing without language by using mental imagery
Language	the understanding and use of linguistic sounds, words, sentences, and discourse
Long-Term Memory Access	the retrieval of information from long-term memory, including knowledge, skills, and experiences
Long-Term Memory Storage	permanently storing information, including knowledge, skills, and experiences
Material Management	organizing the various resources and supplies needed for a task
Math Operations	use of math procedures (e.g., subtraction, simplifying fractions, balancing equations)
Math Reasoning	solving math problems by applying procedures in different situations with changing information
Memory	storage and retrieval of information temporarily (i.e., Short-Term), over extended periods (i.e., Long-Term), or while using the information (i.e., Active Working)
Mental Effort	the flow of energy needed for cognitive work output (e.g., homework)
Mental Energy Control System	the set of attention controls for initiating and maintaining the energy level needed for optimal learning and behavior
Mental Representation	portraying new ideas in varied ways (e.g., anecdotal, visual, verbal, metaphoric) so they are meaningful and lasting
Meta-cognition	ability to think about thinking and learning
Morphemes	components of words that convey some meaning (e.g., prefixes, suffixes, and root words)
Morphological Sense	interpreting parts of words that convey some meaning (see Morphemes)
Morphological Use	utilizing parts of words that convey some meaning (see Morphemes)
Neuromotor Function	the nervous system's control over movement of large muscles (i.e., Gross Motor), hands and fingers (i.e., Fine Motor), and handwriting (i.e., Graphomotor)
Nonverbal Conceptualization	forming concepts without using language, such as place value, equations, planetary movements, or geometric shapes
Oromotor Function	see Articulation and Fluency
Outer Spatial Processing	interpreting and using spatial information when implementing motor activities (e.g., knowing



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	how fast to run when catching a ball)
Overflow Movements	extra movements (e.g., on the other side of the body) when performing highly specific motor tasks; these become increasingly rare as children develop
Pacing	doing tasks at the most appropriate speed, without rushing
Paired Associate Memory	linking and storing two related data bits, retrieving one piece of information when presented with the other piece (e.g., sound with a symbol)
Performance Consistency	a steady, reliable, and predictable flow of the mental energy needed for dependable functioning (moment to moment, day to day, week to week)
Phonemes	individual sounds in words (e.g., the word "big" contains three phonemes: /b/, /i/, /g/)
Phonological Processing/Awareness	this process involves receiving, distinguishing, and manipulating the individual sounds in words (see Phonemes)
Phonics	linking speech sounds with letters and letter combinations
Previewing	anticipating/predicting likely outcomes of actions, events, and problems; planning how to solve a problem before starting to work
Problem Solving	applying a systematic stepwise approach to complex questions or challenges
Procedural Recall (Memory)	storing new skills and processes that involve steps or sequences (e.g., math operations)
Process Conceptualization	forming concepts that explain a mechanism or how something works (e.g., metamorphosis of a butterfly, digestion)
Processing Control System	the set of attention controls for regulating the use of incoming information
Processing Depth (Depth of Processing)	focusing with sufficient intensity to capture details (e.g., instructions)
Production Control System	the set of attention controls for regulating academic and behavioral output
Reading Comprehension	understanding the meaning of the reading text
Reading Decoding	reading individual words, although not necessarily having an understanding of the words
Reasoning and Logical Thinking	coming up with sensible, thoughtful answers to complex issues
Receptive Language	processing and understanding incoming oral and written information
Reinforceability	using previous experience and feedback to guide current behavior and output
Rule Use	learning, developing, and applying rules and principles
Saliency Determination	discriminating between important and unimportant information, avoiding distractions (also known as selective attention)
Satisfaction Control	focusing sufficiently on activities or topics of moderate or low levels of interest; weak satisfaction control can lead to insatiability, or a constant desire for excitement and intense stimulation
Self-monitoring	watching one's own output and making necessary modifications; finding and correcting mistakes
Semantic Understanding	knowing the meanings of words, although not necessarily using or defining the words

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Semantic Use	properly utilizing word meanings, defining words and using them in context
Sentence Comprehension	understanding sentences and sentence structures when listening or reading
Sentence Formulation	expressing thoughts in complete, grammatically correct sentences when speaking and writing
Sequential Awareness/Perception	processing the order of the parts of incoming information
Sequential Memory	retaining the order of steps, events, or other sequences
Sequential Output	creating products in which the content is arranged in the optimal order
Shallow Processing	weak Processing Depth, information is "in one ear and out the other" (also called Superficial Processing)
Short-Term Memory	briefly registering new information that is subsequently used, stored, or forgotten
Sleep-Arousal Balance	sleeping well at night and being sufficiently awake and alert during the day
Social Behaviors	various behaviors that foster optimal relationships with others
Social Cognition	the set of abilities that guide interaction with others, both verbal (e.g., maintaining a conversation) and nonverbal (e.g., using appropriate body language)
Spatial Awareness/Perception	interpreting relationships within and between spatial patterns (e.g., pictures, diagrams, and other visual configurations)
Spatial Memory	storing and recalling spatial information (e.g., shapes, symbols, and images)
Spatial Ordering	the processing, coordination, and application of information that is visual or in a spatial array
Spatial Output	creating products that have spatial characteristics
Superficial Processing	weak Processing Depth, information is "in one ear and out the other" (also called Shallow Processing)
Temporal-Sequential Ordering	the processing, coordination, and application of information that is linear or in a serial order
Time Management	using time efficiently
Verbal Conceptualization	forming concepts using language, such as terms (e.g., due process, energy resources, friendship) and literary ideas (e.g., foreshadowing, themes)
Verbal Elaboration	extending and developing ideas through language production
Verbal Pragmatics	use and understanding of language within social contexts
Word Retrieval	finding the right words quickly and easily when speaking or writing

## Exhibit 7

JUN 28 2013

## COMLEX-USA LEVEL 2-PE/CLINICAL SKILLS EXAMINATION

## APPLICATION FOR TEST ACCOMMODATION – CANDIDATE QUESTIONNAIRE

National Board of Osteopathic Medical Examiners, Inc.

1. The application and all documentation supporting this request for accommodation MUST BE TYPED OR PRINTED. Illegible materials will not be considered.
2. Complete the entire application and answer all questions (attach additional answer sheets if more space is needed to properly and fully respond to this questionnaire).
3. Include all required documentation. See instructions accompanying this application form.
4. Submit this form, Osteopathic Medical School questionnaire, and supporting documentation to NBOME, 8765 W. Higgins Road, Suite 200, Chicago, IL 60631-4174
5. It is recommended that all documentation be submitted via a traceable or return-receipt method in order to verify timely delivery

NBOME ID #: 952316 Social Security #: 060-76-5500  
 Name: Ajay Bahl  
 Address: 151 Wentworth Ave Phone # (Day): (516) 698-3977  
Albertson, NY 11507 Phone # (Evening): N/A  
 Email Address: abahl@nyit.edu

1. Impairment. I have been diagnosed with the following physical or mental impairment(s) that substantially limits my major life activity/activities: 1) Mixed Receptive & Expressive Language Disorder (ICD-9-CM-315.32) 2) Executive Function Disorder (ICD-9-CM-799.55)  
3) Attention Deficit Disorder (ICD-9-CM-314.00) 4) Anxiety, NOS (ICD-9-CM-300.00)

(a) Describe in detail how this impairment(s) substantially limits your major life activity/activities: Due to my language disorder, characterized by dysfluent speech ("cluttering") and my executive function disorder, I require additional time to organize my written output + plan my responses when writing notes after clinical encounters

(b) Does this impairment(s) affect the conduct of your clinical clerkship responsibilities? No X Yes \_\_\_\_ If so, describe in detail how your impairment affects the conduct of your clinical clerkship:

2. Diagnosis. Has your impairment been professionally diagnosed? No      Yes X.  
If so, my impairment was diagnosed on 8/29/2011 (date(s)) by the following professionals:

(a) Name and qualifications of professional(s) diagnosing or treating my impairment:  
Paul B Yellin MD, Assoc Professor of Pediatrics, NYU School of Medicine  
Dr. Yellin has extensive experience diagnosing + treating medical students  
with learning + attention disorders + consult + serves as a consultant to the Medical Educ  
Dept at NYU  
(b) Describe all treatment, medication and/or remediation you have received for your  
impairment: \_\_\_\_\_

(c) Have you ever received a diagnosis or opinion that you do not have the  
impairment? No X Yes     . If so, state the date of such diagnosis or opinion, the name,  
address and qualifications of the professional or other person expressing such diagnosis or  
opinion, and include with this application any report or other documentation pertaining to that  
diagnosis or opinion:  
\_\_\_\_\_  
\_\_\_\_\_

(d) Have you ever received any treatment, or corrective or mitigating measures, for  
your impairment? No X Yes     . If so, describe, including dates, nature and results, of all  
such treatment, corrective or mitigating measures received or provided for your impairment: \_\_\_\_\_  
I participate in speech + language therapy + academic support, but  
they were not successful in mitigating my impairment  
\_\_\_\_\_  
\_\_\_\_\_

3. Accommodation Requested. I request the following accommodation(s) when taking  
the COMLEX-USA Level 2-PE Clinical Skills Examination: Extended time to  
complete notes

This requested accommodation is necessary because:

As a SA, patient has an Expressive Language Disorder ('cluttering')  
and Executive Function Disorder + needs time to organize written  
output (writing notes)  
\_\_\_\_\_  
\_\_\_\_\_

4. Prior Accommodation(s). Have you ever previously received an accommodation for  
your impairment? No X Yes     . If so, describe all accommodations previously received,  
including the date(s) the accommodation was provided and the identity of the school(s) or testing  
agency/agencies providing you with the accommodation: Did Not seek them.

(a) Accommodation(s) in educational setting: \_\_\_\_\_

(b) Accommodation(s) in test taking (other than clinical testing): \_\_\_\_\_

(c) Accommodation(s) in clinical skills or performance-based tests: \_\_\_\_\_

(d) Other accommodations: \_\_\_\_\_

(e) Have you ever been denied any requested accommodation? No X Yes \_\_\_\_\_. If so, state the date of each such denial, identify the school(s), testing agency/agencies or other entity denying the requested accommodation, and describe in detail the circumstances of each request for an accommodation and any stated reasons for the denial: \_\_\_\_\_

5. Testing Without Accommodation. Have you ever taken any examination or test without an accommodation? No \_\_\_\_ Yes X. If so, describe all examinations you have taken without an accommodation, and for each such examination state the date(s) or period(s) the examination(s) was administered, the school or testing agency administering such examination, and whether or not you successfully completed the examination without an accommodation:  
SAT (April 2002) and MCAT (2006-2007, College of NYU) were both completed w/o accommodations and are both not pass/fail exams.

I, THE UNDERSIGNED APPLICANT FOR ACCOMMODATION (S) UNDER THE ADA,

1. CERTIFY, UNDER THE PENALTIES FOR PERJURY, THAT ALL THE FOREGOING REPRESENTATIONS AND ACCOMPANYING DOCUMENTATION ARE TRUE AND COMPLETE,

2. AGREE TO THE REQUIREMENTS OF THIS REQUEST FOR ACCOMMODATION, THE NBOME'S CONDITIONS OF THE ADMINISTRATION OF THE COMLEX-USA LEVEL 2-PE EXAMINATION, AND ANY ACCOMMODATION THAT MAY BE PROVIDED, AND

3. AUTHORIZE ANY PERSON, SCHOOL, COMPANY, FACILITY, OFFICE AND/OR ENTITY WHICH HAS INFORMATION OR DOCUMENTATION RELATING TO MY REQUEST FOR ACCOMMODATION (S) TO CONSULT WITH, TO MAKE WRITTEN REPORTS TO, AND TO RELEASE INFORMATION INCLUDING, BUT NOT LIMITED TO, MEDICAL AND/OR TESTING RECORDS, TO THE NBOME OR ITS REPRESENTATIVES.

Applicant: Amy Ball Date: 6/19/13  
 (Signature)

National Board of Osteopathic Medical Examiners, 8765 W. Higgins Road, Suite 200, Chicago, IL 60631-4174



## COMLEX-USA LEVEL 2-PE/CLINICAL SKILLS EXAMINATION

## OSTEOPATHIC MEDICAL SCHOOL QUESTIONNAIRE

This questionnaire is to be completed by the Dean of the osteopathic medical school/college where the applicant has studied osteopathic medicine, and forwarded to the NBOME by the candidate with a completed Candidate Questionnaire, supporting documentation and examination application.

I, Felicia Bruno, as the Dean of Assistant Student Services at NYIT  
Name of dean College of Osteopathic Medicine  
Osteopathic medical school/college  
 verify that Ajay Bahl is on  
Name of applicant

record at this osteopathic medical school/college as having the following physical impairment: None

This applicant has received accommodation(s) in an educational setting Yes ☒ No  
 (If yes, please complete the following)

What accommodations(s) were given: \_\_\_\_\_

This applicant has received accommodation(s) in performance-based testing (e.g., Clinical Skills Exams, OSCEs) Yes ☒ No (If yes, please list the accommodations provided)

If the candidate was provided an accommodation under the Americans with Disabilities Act ("ADA"), describe all diagnosis and/or documentation provided to or considered by the school in support of the candidate's request for an accommodation: \_\_\_\_\_

N/A  
 Signed Felicia Bruno Date: 6/6/13  
(Dean of osteopathic medical school/college)

\*\*\*\*PLEASE TYPE OR PRINT BELOW\*\*\*\*

Name of Dean: FELICIA BRUNO Official Title: Assistant Dean

Business Address:

Northern Blvd  
Old Westbury, NY

Business Phone 516 686-1329  
 Business Fax 516 686-3822

\* THE NBOME RESERVES THE RIGHT TO VERIFY ALL INFORMATION SUBMITTED\*

National Board of Osteopathic Medical Examiners, 8765 W. Higgins Road, Suite 200, Chicago, IL 60631-4174

## Exhibit 8



**National Board of Osteopathic Medical Examiners  
Test Accommodations Committee  
Meeting Minutes**

**DATE:** Wednesday, June 26, 2013

**PRESENT:** Committee members - Drs. J. Magen (Chair), W. McCord (Vice Chair), J. Andriole, T. Dombrowski, R. Foster, L. Kemper, R. LaBaere, G. Palman, R. Wattleworth, B. Wood; Staff - C. McGrath (Recorder), M. Wong; Consultant - S. Kelsner; Counsel - S. Steele

**ABSENT:** Committee member - Drs. B. Fulton, J. King,

Meeting called to order at 7:04 PM (EST).

Committee members approved the minutes for the May 2013 meeting.

The committee discussed and voted on the following applications:

1. [REDACTED] (Level 1)

Application: [REDACTED]

Discussion: [REDACTED]

2. [REDACTED] (Level 1)

Application: [REDACTED]

Discussion: [REDACTED]

Decision: [REDACTED]

3. [REDACTED] (Level 1-Reconsideration)

Application: [REDACTED]

Discussion: [REDACTED]

Decision: [REDACTED]

4. Ajay Bahl (Level 2-CE)

Application: Candidate requested double time.

Discussion: The committee carefully considered the application and all documentation submitted, particularly the report from Paul Yellin, MD and Beth Guadagni, MA, as well as the report from NBOME's independent outside consultant Benjamin Lovett, PhD. After further discussion, the committee determined that the documentation did not support his request and that the request is, therefore, denied.

Decision: Denied.

5. [REDACTED] (Level 2-CE)

Application: [REDACTED]

Discussion: [REDACTED]

Decision: [REDACTED]

6. [REDACTED] (Level 2-PE)

Application: [REDACTED]

Discussion: [REDACTED]

Decision: [REDACTED]

7. [REDACTED] (Level 2-CE)

Application: [REDACTED]

Discussion: [REDACTED]

Decision: [REDACTED]

8. [REDACTED] (Level 2-CE)

Application: [REDACTED]

Discussion: [REDACTED]

Decision: [REDACTED]

9. [REDACTED] (Level 3)

Application: [REDACTED]

Discussion: [REDACTED]

[REDACTED]

Decision: [REDACTED]

10. Legal update (Syd) – [REDACTED]

11. Meeting adjourned 8:02 PM (EST)

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CONFIDENTIAL

NBOME00067

## Exhibit 9



## **CURRICULUM VITAE**

### **PERSONAL DATA**

Name: Richard J. LaBaere II D.O., M.P.H.  
Date of Birth: June 16, 1962  
Place of Birth: Mt. Clemens, Michigan  
Marital Status: Married  
Spouse's Name: Catherine A.  
Children: Amanda Renee, Matthew Richard

Home Address: 900 Shelmar Lane  
Ortonville, Michigan 48462  
(248) 628-0533  
(248) 840-4503 cell

Work Address: Still OPTI  
800 West Jefferson  
Kirksville, Missouri, 63501  
(660) 626-2040  
rlabaere@atsu.edu

### **EDUCATION**

High School: Chippewa Valley High School  
Mt. Clemens, Michigan, 1976-1980

Undergraduate: University of Michigan  
Ann Arbor, Michigan  
Bachelor of Science 1980-1984

Graduate/Professional: University of Michigan  
Ann Arbor, Michigan  
Master of Public Health in Health Behavior and Health Education  
1984-1986

Michigan State University College of Osteopathic Medicine  
East Lansing, Michigan  
Doctor of Osteopathy 1986-1990

### **POSTGRADUATE TRAINING**

Internship: Traditional Rotating  
Flint Osteopathic Hospital  
Flint, Michigan  
1990-1991

Residency: Family Medicine  
Flint Osteopathic Hospital  
Michigan State University COGMET Program  
1991-1993

Fellowship: Leadership in Osteopathic Medical Education  
Kirksville College of Osteopathic Medicine, A.T. Still University  
2004-2005

#### **BOARD CERTIFICATION**

American Board of Osteopathic Family Physicians  
October 28, 1993 No. 5801

#### **EMPLOYMENT**

Private Practice in Family Medicine  
Flint Osteopathic Hospital/Genesys Regional Medical Center  
July 1993-Dec. 1997

Family Medicine Ambulatory Clinic Preceptor  
Flint Osteopathic Hospital  
July 1993-July 1999

Family Medicine Residency Program Director  
Flint Osteopathic Hospital/Genesys Regional Medical Center  
July 1993- July 2006

Full-time Faculty  
Genesys Regional Medical Center  
Jan. 1998-December 2012

Director of Medical Education-Osteopathic  
Genesys Regional Medical Center  
July 1998-February 2007

Director of Medical Education and Designated Institutional Official (DIO)  
Genesys Regional Medical Center  
February 2007- July 2011

Medical Director for Curriculum, Accreditation and Undergraduate  
Medical Education  
Genesys Regional Medical Center  
July 2011-December 2012

Director of Medical Education-Interim  
Designated Institutional Official  
Genesys Regional Medical Center  
November 2011- October 2012

Associate Dean for Postgraduate Training and Academic Officer  
Kirkville College of Osteopathic Medicine, Still OPTI  
January 2013- present

#### **MEDICAL STUDENT ACTIVITIES**

Assistant Dean, Michigan Region  
Kirkville College of Osteopathic Medicine  
August 2000-present

Student Director of Medical Education

Kirkville College of Osteopathic Medicine  
April 1999-August 2000

Lecturer/Discussion Leader/Preceptor  
Primary Care Ambulatory Clerkship  
Michigan State University College of Osteopathic Medicine  
Kirkville College of Osteopathic Medicine  
Sept. 1998-Present

Family Medicine Rotation Preceptor  
Michigan State University College of Osteopathic Medicine  
Kirkville College of Osteopathic Medicine  
July 1993-December 2012

#### **FACULTY APPOINTMENTS**

A.T. Still University, Kirkville College of Osteopathic Medicine-  
Adjunct Clinical Professor

Michigan State University, College of Osteopathic Medicine  
Clinical Assistant Professor

#### **MEMBERSHIPS**

American Osteopathic Association  
Michigan Osteopathic Association  
American College of Osteopathic Family Physicians  
Michigan Association of Osteopathic Directors and Medical Educators  
American Association of Osteopathic Directors and Medical Educators

#### **LEADERSHIP and COMMITTEE WORK**

Admissions, Michigan State University College of Osteopathic Medicine  
Peer Ethics, Michigan State University College of Osteopathic Medicine  
Nursing Liaison, Flint Osteopathic Hospital (FOH)  
Medical Executive Flint Osteopathic Hospital/Genesys Regional  
Medical Center (FOH/GRMC)  
Program Advisory Committee for Family Medicine COGMET  
Housestaff Medical Education FOH/GRMC  
Quality Assurance FOH/GRMC  
Institutional Review Board FOH/GRMC  
Osteopathic Medicine Recruitment FOH  
Intern Training Committee GRMC Chair  
Family Medicine Recruitment GRMC  
Family Medicine Curriculum Development and Evaluation GRMC  
Internship Curriculum Development Subcommittee Chair, Michigan  
Association and Osteopathic Directors and Medical Educators (MAODME)  
Parish Nurse Interdisciplinary Team GRMC  
President MAODME  
President-Elect MAODME  
MSUCOM Curriculum Committee  
MSUCOM Statewide Campus System Strategic Planning Committee  
MSUCOM Statewide Campus System Governing Board, Chair

MSUCOM Statewide Campus System Membership Committee, Chair  
MSUCOM Accreditation Self Study Committee  
Executive Committee, Michigan Association of Medical Educators  
Medical Education Research Committee, GRMC  
Board of Trustees, Whaley's Children Center  
Board of Trustees, Association of Osteopathic Directors and Medical Educators (AODME)  
Secretary, AODME  
Treasurer, AODME  
President-Elect, AODME  
President, AODME, 2012  
Bureau of Osteopathic Medical Educators, American Osteopathic Association (AOA)  
Program & Training Review Committee (PTRC) AOA, Vice Chair, PTRC 2012-2013  
PTRC Chair, AOA 2013-present  
Institution and Intern Education Committee (IIEC), AOA Chair  
Board of Directors, National Board of Osteopathic Medical Examiners (NBOME)  
Blue Ribbon Panel, NBOME  
Blue Print Task Force, NBOME  
Portfolio and Expanded Assessment Task Force, Chair NBOME  
Marketing and Communication Task Force, NBOME  
Executive Committee, Board of Directors NBOME  
Testing and Accommodations Committee, NBOME  
Chair, Board of Governors, Still OPTI January 2013 to present

#### **AWARDS**

**Valedictorian** Chippewa Valley High School June 1980  
Mt. Clemens, Michigan

**General Practitioner of the Year** June 1996  
Genesys Regional Medical Center Flint Osteopathic Campus  
Flint, Michigan

**Primary Care Educator of the Year** by the Housestaff, June 2001  
Genesys Regional Medical Center  
Grand Blanc, Michigan

**Flint Area Channel 25 "Working Person of the Week,"** July 2001

**"Above and Beyond Award"**  
A.T. Still University, July 2004  
Kirksville, Missouri

**Certificate of Recognition**  
Regional Assistant Dean  
A.T. Still University, October, 2006  
Kirksville, Missouri

**Osteopathic Family Physician of the Year**  
2006-2007  
Michigan Association of Osteopathic Family Physicians

**AOA Mentor Hall of Fame Inductee**  
June 2007

**Fellow**

Association of Osteopathic Directors and Medical Educators  
April 2008

**Guardian of the Profession**

American Osteopathic Association  
February 2014

**CERTIFICATES**

**Residency Trainer**

Academic Physician Leadership Program and Faculty Development in  
Family Medicine  
Michigan State University College of Osteopathic Medicine  
Statewide Campus System

**Leadership in Osteopathic Medical Education**

Kirkville College of Osteopathic Medicine, A.T. Still University  
2004-2005

**PUBLICATIONS and POSTERS**

Jacobsen Syndrome: Chromosome Deletion at 11q23, DR Clang and  
**LaBaere RJ**, J Am Osteopath Assoc 1998 98: 55

Resident Attitudes Regarding the Impact of the 80-Duty-Hours Work  
Standards, Susan C. Zonia, **Richard J. LaBaere, II**, Manfred Stommel,  
and Daniel D. Tomaszewski, J Am Osteopath Assoc 2005 105: 307-313.

Faculty Development for Family Medicine Training, Margaret Wilson,  
**Richard LaBaere II**, Poster at American Association of Colleges of  
Osteopathic Medicine Annual Conference, April 2014

Burnout, Depression, and Modifiable Factors in Osteopathic Medical  
Students, Lapinski, J., Yost M., Sexton, PS. and **LaBaere, RJ.** (2014).  
Submitted to Academic Psychiatry 10/28/2014.

**EDUCATIONAL PROGRAMS and PRESENTATIONS**

**Computers in Medicine August 1994**

Family Medicine COGMET/MSUCOM-SCS Educational Day Coordinator

**Colorectal Disease August 1996**

Family Medicine COGMET/MSUCOM-SCS Educational Day Coordinator

**Geriatrics Update March 1997**

Family Medicine COGMET/MSUCOM-SCS Educational Day Coordinator

**Colorectal Disease August 1997**

Family Medicine COGMET/MSUCOM-SCS Educational Day Coordinator

**Colorectal Disease August 1998**

Family Medicine COGMET/MSUCOM-SCS Educational Day Coordinator

**Gastrointestinal Diseases November 1998**

Family Medicine COGMET/MSUCOM-SCS Educational Day Coordinator

**Pediatric/Adolescent Medicine January 2000**

Family Medicine COGMET/MSUCOM-SCS Educational Day Coordinator

**Gastrointestinal Diseases/Hands-on Workshops November 2000**

Family Medicine COGMET/MSUCOM-SCS Educational Day Coordinator

**Postgraduate Training in the AOA and ACGME September 2001**

Lecture, MSUCOM 3rd and 4<sup>th</sup> Year Students, East Lansing MI

**Pediatric/Adolescent Medicine January 2002**

Family Medicine COGMET/MSUCOM-SCS Educational Day Coordinator

**Gastrointestinal Diseases/Hands-on Workshops November 2002**

Family Medicine COGMET/MSUCOM-SCS Educational Day Coordinator

**Dual Accredited AOA/ACGME Programs: Is this a Good Idea for You? Co-**

Presenter for a Workshop at the Osteopathic Medical Education Conference XII in Rosemont, Illinois September 2001

**Preparing for Internship Interviews**

Panel Presenter at the Michigan Osteopathic Association Annual Meeting  
MSUCOM Students Dearborn, Michigan May 1999, 2000, 2001, 2002, 2003, 2004, 2010

**Director of Medical Education Update**

Panel Presenter at the AODME Annual Conference, Las Vegas, NV March, 2003

**Director of Medical Education Update**

Panel Presenter at the AODME Annual Conference, Marco Island, FL March 2004

**Leadership Training Opportunities**

Moderator, AODME Annual Conference, Marco Island, FL March 2004

**Evidence-Based Medicine Lecture Series**

Presented to the Genesys Family Practice Residency, 2003-2004

**Endocrinology/Hands-on Workshops June, 2004**

Family Medicine COGMET/MSUCOM-SCS Educational Day Coordinator

**Evidence Based Medicine for the Family Physician**

Co-Presenter, Earl Congdon Series, Grand Blanc, MI Oct., 2004

**Strategic Planning for the Medical Education Enterprise**

Co-Presenter, AODME Annual Conference, Savannah, GA April 2006

**White Coat Ceremony Keynote Speaker**

Kirksville College of Osteopathic Medicine, A.T. Still University August 2006

**Faculty Development in Professionalism**

Kirksville College of Osteopathic Medicine, A.T. Still University October 2006



**Professionalism, One of the AOA Core Competencies**

St. John's Riverview, Detroit, MI December 2006

**The Dually Accredited Family Medicine Program in 2007**

Co-Presenter, ACOFP Annual Program Directors Conference,  
Kissimmee, Florida March 2007

**Program Committee Chair,**

Association of Osteopathic Directors and Medical Educators Annual Conference,  
April 2006, May 2007

**Enhancing Professionalism in Osteopathic Medical Education**

Co-Presenter, Association of American Colleges of Osteopathic Medicine Annual Conference,  
Baltimore, Maryland, June 2007

**The Dually Accredited Family Medicine Program in 2008**

ACOFD Annual Program Directors Conference,  
Denver, Colorado March 2008

**Controversies in OME: MD's in DO Programs?**

Co-Presenter, AODME Annual Conference  
Seattle, WA April 2009

**Managing GME Positions:**

**Being Proactive to Life Above Your Cap**

AODME Annual Conference  
San Antonio, TX April 2010

**Preparing for the Match**

Panel Presentation for MSUCOM students at MOA  
Dearborn, MI, May, 2010, 2011, 2012

**Operationalizing Professionalism**

Michigan Association of Medical Educators  
Howell, MI, September 2010

**Residency Match Workshop**

Panel Presenter for students at KCOM  
Kirksville, MO, March, 2011

**Accreditation Update**

AODME Annual Conference  
Louisville, KY April 2012

**The Impact of Culture in High Reliability Organizations**

Congdon CME Series  
Grand Blanc, MI, October 2012

**Stepping Toward a Unified Accreditation System for Graduate Medical Education**

Michigan Association of Medical Educators  
Howell, MI, November, 2012

**Pearls for Success as a New 3rd Year Student: A Top Ten List of Things to Do**

Kirksville College of Osteopathic Medicine Fellows  
Kirksville, MO January 2013

**Next Steps: Best Strategies for Delivering Bad News**  
Congdon CME Series  
Grand Blanc, MI, April 2013

**Culture, Quality and Mission Faculty Development Series**  
Co-Presented with Dr. Patricia Sexton  
Kirksville College of Osteopathic Medicine  
Kirksville, MO, April, May, July 2013

**Regional Clinical Preceptor Education Conference**  
Kirksville College of Osteopathic Medicine  
Kirksville, MO September 2013

**Moving Toward a New System, a Unified System of GME Accreditation**  
Michigan State University College of Osteopathic Medicine Statewide Campus System  
Faculty Development Forum Webinar  
March 2014

**Post Memorandum of Understanding (MOU) Between ACGME and AOA:  
Opportunities and Challenges in Osteopathic GME**  
Co-Presented with Dr. Jon Rohrer  
American Hospital Medical Educators, Annual Meeting  
Charleston, South Carolina May 2014

**Osteopathically Distinctive Assessment in the New Single GME Accreditation System**  
Co-Presented with Karen Snider DO  
Mitchell Kasovac, DO Honorary Lecture, Osteopathic Medical Education Leadership  
Conference, Los Angeles, CA January 2015

**CURRICULUM VITAE****James Michael Andriole, D.O.**

1919 Seminole Drive  
 Tallahassee, FL 32301  
 850 878 0303 - Phone  
 850 878 5494 - Fax

[jimardt1s@comcast.net](mailto:jimardt1s@comcast.net) - Bmail.

**Summary Statement:**

Compassionate, caring, and motivational physician with a multifaceted background who effectively combines administrative business roles, with a passion for volunteering and a dedication to assist, enable, and actively participate.

**Citizenship:** United States of America

**Birth:** Hazleton, Pennsylvania

**Education:** High School Diploma, MMI School, Freeland, PA  
 B.S degree, Magna Cum Laudo, Belmont Abbey College, Belmont NC  
 D.O. degree, Philadelphia College of Osteopathic Medicine

**Post Graduate:** Suburban General Hospital - Rotating Internship

**License and Certification:** Diplomate of National Board of Examiners - No. 11735  
 State of Colorado Medical License -No. 37488  
 State of Florida Medical License No. OS 0005956  
 Commonwealth of Pennsylvania Medical License No. OS005541-L  
 Board Certified Diplomate - American Board of Quality Assurance and Utilization Review Physicians No. 3650

**Medical Experience:** 1995-Present President/CEO Disability Consultants USA Inc.

Founded this highly regarded company that contracts with the State of Florida. Directly manages a team of physicians and psychologists to review medical claims for the State of Florida and the Social Security Administration.

1998-Present County Health Department, State of Florida Volunteer Physician

Family Medicine serving the medically needy surrounding counties to Tallahassee, Wakulla County Health Dept. walk-in clinics and Gadsen County Migrant Farm workers children's clinic.

1994-Present Medical Review and Evaluation Services for the State of Florida, Disability Determinations

1990-1994: Senior Physician: State of Florida

1988-1990: Medical Director: Lock Haven University

Provided general clinical medical care for the students and performed administrative roles with the university staff.

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[http://nbomeapp.nbome.org/pls/apex\\_prod/f?p=201:10:256450711131221..](http://nbomeapp.nbome.org/pls/apex_prod/f?p=201:10:256450711131221..)

**1985-1989:** Physician Examiner, Commonwealth of Pennsylvania-Social Security Disability Determinations

**1985-1990:** Occupational Medicine/Company Physician  
Woolrich Woolen Mills: Pre-employment physicals and annual executive physicals and developed preventive medicine program.  
Hammermill/International Paper: Pre-employment physicals

**1985-1990:** Established Solo Practice, Lock Haven, PA

Opened solo practice in a converted 100 year old queen Victorian home.

**1985-1990:** Solo Practice

Second office location in an underserved, rural, medically needy, mostly Amish population in the village of Loganton, PA.

#### **Medical Review:**

State of Florida: Department of Health, Office of Disability Determinations DDS-SSA

State of Colorado: Office of Disability Determinations-DDS-SSA

Chief Quality Consultant/Review for Disability Consultants USA, Inc

Medical Consultant and Review for Fonville Hinkle Law Firm

Medical Consultant for Sybaritic, Inc, Edina, MN

QAIUR Consultant, NEP Administrators, Sybertsville, PA

Utilization Review Consultant, Susque-View Home, Lock Haven, PA

Physician Liaison, Keystone Peer Review, Harrisburg, PA

Medical Consultant, Physician Review Corporation, Pittsburgh, PA

QAIUR Consultant, Medical Management Consultants, Jersey Shore, PA

#### **Appointments & Honors:**

**2008:** Distinguished Alumni Wall of Fame Honoree  
Rehmont Abbey College

**2008:** Medicaid Pharmaceutical and Therapeutics Committee  
Appointed by Governor Charlie Crist

**2007-2010:** Elected Board Member- Federation of State Medical Boards

**2008-2010:** Elected President- American Association of Osteopathic Examiners (AAOE)

**2008-2009:** Appointed Chair-Governance Committee, Federation of State Medical Boards

**2008-2010:** International Association of Medical Regulatory Authorities (IAMRA), Participating Delegate  
Attended and participated in the Capetown, South Africa conference on Medical Professionalism

**2008-2009:** Liaison to the Florida Board of Osteopathic Medicine, Florida Osteopathic Medical Association

**2007-2009:** Physician Accountability for Physician Competence Summit- National Alliance. Participant

**2007-2009:** Elected Chair- Probable Cause Panel Florida Board of Osteopathic Medicine.